

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JULIA PAXTON,)	
on behalf of herself and the)	
class members described below,)	
)	
Plaintiff,)	12-cv-6499
)	
vs.)	Judge Thomas M. Durkin
)	
NATIONAL CREDIT)	
ADJUSTERS, L.L.C.,)	
)	
Defendant.)	

**PETITION FOR, AND MEMORANDUM IN SUPPORT OF, AWARD
OF CLASS COUNSEL'S FEES AND COSTS**

Plaintiff, Julia Paxton, brought this class action against Defendant National Credit Adjusters, LLC ("NCA") on August 16, 2012, alleging that NCA violated the Fair Debt Collection Practices Act and Illinois state law by attempting to collect illegal usurious payday and by representing that such loans were legally enforceable. Plaintiff further alleged that NCA violated the law by attempting to collect debts consisting of notes where it did not have an original signed instrument with a chain of endorsements beginning with the original lender and ending with NCA or an endorsement to bearer.

On March 16, 2016, the Court entered an order, granting preliminary approval to the parties' settlement. (Doc. 183.) The settlement is to be distributed as follows:

1. NCA is to pay \$20,000.00 to create a settlement fund for members of Class A (statutory damages class) to be paid *pro rata* to class members who timely submit a claim form;
2. NCA is to pay \$150,000.00 to create a settlement fund for members of Class B

(actual damages class) to be paid to class members who timely submit a claim form. Members of Class B recovery will be distributed by calculating the total amount paid over principal plus 9% interest by Class B Claimants, and assigning a percentage to each Class B Claimant based in their proportionate share of the total dollar value of Class B claims submitted ;

3. NCA is to \$4,500 to Plaintiff, Julia Paxton for her statutory damages and as an incentive award for her services to the classes;

3. NCA is to pay \$180,000 to be paid to class counsel for attorney's fees and costs.

Class Counsel, Edelman, Combs, Lattuner & Goodwin, LLC ("ECLG"), hereby petitions the Court for an award of \$180,000 for its attorney's fees and costs and submits this memorandum in support of its petition. As of the date of filing, ECLG has incurred more than \$280,000 in litigating this action. *See Appendix F* to Declaration of Daniel A. Edelman, Exhibit 1.

ARGUMENT

I. ECLG'S Petition For \$180,000 In Fees And Costs Is Fair And Reasonable

To date, ECLG has incurred more than \$280,000 in fees and costs. ECLG's petition for \$180,000 in fees and costs (9/14 of its fees and expenses) is fair and reasonable. The Fair Debt Collection Practices Act, 15 U.S.C. § 1692 *et seq.* ("FDCPA") allows ECLG to recover for its work in this action. Section 1692k provides that "any debt collector who fails to comply with any provision of this subchapter with respect to any person" is liable, *inter alia*, for "in the case of any successful action to enforce the foregoing liability, the costs of the action, together with a reasonable attorney's fee as determined by the court." 15 U.S.C. §1692k(a)(3).

The fees and costs incurred by ECLG in litigating this case were incurred in the course

of performing the following tasks:

- A. **Pre-Complaint Legal and Factual Investigation.** ECLG began conducting a factual and legal investigation of Plaintiff's claims in 2012. This investigation included an analysis of applicable federal and Illinois statutes, regulations, and case law, as well as the elements and potential defenses for each of the proposed claims. Once the initial factual and legal research had been completed, ECLG drafted, prepared, and filed the Complaint, engaging in correspondence with Plaintiff at the inception of the case and throughout.
- B. **Discovery.** After NCA filed an answer and affirmative defenses, the parties engaged in written and oral discovery. The parties also engaged in expert discovery including submitting expert reports and the depositions of Plaintiff's expert. ECLG issued a number of written discovery requests to NCA which, from time to time, led to ECLG filing motions to compel. ECLG took four depositions of a representative of NCA. ECLG assisted Plaintiff in answering NCA's written discovery requests, prepared Plaintiff for her deposition, and defended Plaintiff's deposition.
- C. **Class Certification.** ECLG moved for class certification and filed a reply and sur-reply in support of the motion. Following a settlement conference with the Honorable James F. Holderman who was at the presiding judge over the case, Plaintiff filed an amended class certification motion wherein plaintiff limited a nationwide class to an Illinois only class. The amended motion for class certification was fully briefed and defendant raised new issues concerning the class representative that had not been previously briefed.
- D. **Settlement.** During the pendency of this case the parties attended several global settlement conferences in an effort to resolve this matter absent protracted litigation. In

2013 the parties attended a global settlement conference with Magistrate Judge Paul R. Cherry in Hammond, Indiana at which time the parties were unsuccessful in resolving the case. Subsequently, In February 2015 the parties again attended a global settlement conference with the Judge Holderman. Although the parties did not resolve the case at that time, the settlement conference was continued for another session in March 2015. This two day settlement conference was ultimately unsuccessful. In November 2015 the parties decided to explore settlement again, and scheduled a mediation session with the Honorable James F. Holderman at JAMS due to his familiarity with the case. On November 24, 2015 a global settlement conference was held with Judge Holderman wherein the parties were able to resolve this case along with two class action cases pending in New York and a recently filed case pending in Indiana. Before, each settlement conference ECLG prepared a settlement position memorandum. Additionally, before, during, and after each settlement conference, ECLG and counsel for NCA also discussed settlement issues. After the parties reached a settlement, ECLG and NCA's counsel drafted and approved settlement documents, and moved for preliminary approval of the settlement.

In light of the results achieved for the class members, and the length of time and difficulty in achieving those results, an award of \$180,000 to ECLG is fair and reasonable, particularly in light of the fact that ECLG's fee award is more than \$100,000.00 less than its lodestar.

Moreover, ECLG will incur additional fees and costs in wrapping up the case, including the drafting of a final approval memorandum, attendance at the fairness hearing, and responding

to any calls from class member.

The recent Seventh Circuit decisions that hold that “attorneys’ fees awarded to class counsel should not exceed a third or at most a half of the total amount of money going to class members and their counsel.” *Pearson v. NBTY, Inc.*, 772 F.3d 778, 782 (7th Cir. 2014); *Redman v. RadioShack Corp.*, 768 F.3d 622, 630 (7th Cir.2014) (accord), do not address class settlements where the recovery to the class is capped.

Unlike the Fair And Accurate Credit Transactions Act at issue in *RadioShack* and the various state consumer protection laws in *NBTY*, the Fair Debt Collection Practices Act, 15 U.S.C. § 1692 et seq. (“FDCPA”) imposes a limit on the class’s recovery. A class is limited to recovering the lesser of 1% of a defendant’s net worth or \$500,000. 15 U.S.C. § 1692k(a)(B).

In recognition of the benefits provided by FDCPA litigation, Courts have long awarded attorney’s fees in excess of what the individual plaintiff or the class recovers. That has not changed since the *RadioShack* and *NBTY* decisions. In *Kasalo v. Trident Asset Management, LLC*, 2015 WL 2097605 (N.D. Ill. May 3, 2015), Judge Kennelly awarded attorney’s fees of approximately \$100,000.00 in an individual FDCPA case in which the plaintiff only received \$1,000. On March 19, 2015, in *Perez v. Monarch Recovery Management, Inc.*, 13 C 5694 (N.D. Ill), Judge Zagel gave final approval to an FDCPA class action settlement in which the class recovered \$23,000, the maximum statutory amount, and \$99,500.00 was awarded in attorneys’ fees and costs. Similarly, on January 13, 2015, in *Moore v. Stellar Recovery, Inc.*, 13-cv-02294 (N.D. Ill.) Judge Kendall awarded attorneys fees to Class Counsel of \$62,500.00 where the class fund was \$20,000.00. (Exhibits 2 and 3.)

Section 1692k of the FDCPA provides for reasonable attorneys' fees and costs to a plaintiff who brings a successful action under the Act. The FDCPA limits a class's recovery to the lesser of 1% of a defendant's net worth or \$500,000 plus actual damages. 15 U.S.C. § 1692k(a)(B). Because of the cap, in an FDCPA case, a plaintiff's attorneys' fees can often exceed the class's recovery if the net worth of the defendant is relatively modest. Applying a proportionality standard to an FDCPA class case would be the death knell of such cases. Defendant's counsel, could put up a vigorous defense, knowing that plaintiff's attorneys' fees would be unrecoverable because of the cap on the class's recovery. A zealous defendant's counsel can force the plaintiff's attorneys' fees to skyrocket by scorched earth tactics, knowing that the plaintiff's counsel will never be able to recover those fees because of the Act's limit on what the class can recover. Nothing in *NBTY* or *Radio Shack* suggests that the Seventh Circuit intended this outcome in FDCPA cases, which will discourage class action suits under the FDCPA.

In an FDCPA case, an award of attorney's fees to the prevailing plaintiff is mandatory. 15 U.S.C. § 1692k(3). *Tolentino v. Friedman*, 46 F.3d 645, 651 (7th Cir. 1995). Attorney's fees are mandatory because Congress intended "that the Act should be enforced by debtors acting as private attorneys general." *Id.* (quoting *Graziano v. Harrison*, 950 F.2d 107, 113 (3d Cir.1991).) "Unlike most private tort litigants, [a plaintiff who brings an FDCPA action] seeks to vindicate important * * * rights that cannot be valued solely in monetary terms", *City of Riverside v. Rivera*, 477 U.S. 561, 106 S.Ct. 2686, 91 L.Ed.2d 466 (1986), and congress has determined that the public as a whole has an interest in the vindication of the statutory rights. *Id.* *Tolentino*, 46 F.3d at 652.

Plaintiff filed a claim based upon a fee-shifting statute. Plaintiff obtained a reasonable recovery for herself and the class, but incurred large attorneys fees because defendant's put up a Stalingrad defense. Once an action is filed, plaintiff's counsel must continue to zealously litigate the case, even if the attorneys fees begin to exceed the statutory cap. An award of \$180,000 (a fraction of its lodestar) to ECLG is reasonable.

CONCLUSION

For the foregoing reasons, the Court should find that \$180,000 is fair and reasonable and award that amount to ECLG in fees and costs.

Respectfully submitted,

/s/Tiffany N. Hardy

Tiffany N. Hardy

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Cathleen M. Combs
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CERTIFICATE OF SERVICE

I, Tiffany N. Hardy, hereby certify that on June 8, 2016, I filed the forgoing document with the Clerk of the Court using the CM/ECF System, which caused to be sent notification of such filing to the following parties via electronic mail:

David M. Schultz
dschultz@hinshawlaw.com

Jennifer W. Weller
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/s/ Tiffany N. Hardy
Tiffany N. Hardy

EXHIBIT 1

DECLARATION OF DANIEL A. EDELMAN

Daniel A. Edelman declares under penalty of perjury, as provided for by 28 U.S.C. §1746, that the following statements are true:

Daniel A. Edelman declares under penalty of perjury, as provided for by 735 ILCS 5/1-109, that the following statements are true:

1. Edelman, Combs, Lattuner & Goodwin, LLC, has 9 principals, Daniel A. Edelman, Cathleen M. Combs, James O. Lattuner, Tara L. Goodwin, Francis R. Greene, Julie Clark, Heather Kolbus, Cassandra P. Miller, Tiffany N. Hardy, and three associates.

2. **Daniel A. Edelman** is a 1976 graduate of the University of Chicago Law School. From 1976 to 1981 he was an associate at the Chicago office of Kirkland & Ellis with heavy involvement in the defense of consumer class action litigation (such as the General Motors Engine Interchange cases). In 1981 he became an associate at Reuben & Proctor, a medium-sized firm formed by some former Kirkland & Ellis lawyers, and was made a partner there in 1982. From the end of 1985 he has been in private practice in downtown Chicago. Virtually all of his practice involves litigation on behalf of consumers, through both class and individual actions. He is the author of the chapters on the "Fair Debt Collection Practices Act," "Truth in Lending Act," and "Telephone Consumer Protection Act" in *Illinois Causes of Action* (Ill. Inst. For Cont. Legal Educ. 2014 and earlier editions), author of the chapter on the Telephone Consumer Protection Act in *Federal Deception Law* (National Consumer Law Center 2013 Supp.), author of *Collection Defense* (Ill. Inst. Cont. Legal Educ. 2008, 2011), and *Collection Litigation: Representing the Debtor* (Ill. Inst. Cont. Legal Educ. 2014); author of Chapter 6, "Predatory Lending and Potential Class Actions," in *Real Estate Litigation* (Ill. Inst. For Cont. Legal Educ. 2004, 2008, 2013), co-author of Rosmarin & Edelman, *Consumer Class Action Manual* (2d-4th editions, National Consumer Law Center 1990, 1995 and 1999); author of *Representing Consumers in Litigation with Debt Buyers* (Chicago Bar Ass'n 2008); *Predatory Mortgage Lending* (Ill. Inst. for Cont. Legal. Educ. 2008, 2011), author of Chapter 6, "Predatory Lending and Potential Class Actions," in *Real Estate Litigation* (Ill. Inst. For Cont. Legal Educ. 2004, 2008, 2014), *Illinois Consumer Law*, in Consumer Fraud and Deceptive Business Practices Act and Related Areas Update (Chicago Bar Ass'n 2002); *Payday Loans: Big Interest Rates and Little Regulation*, 11 Loy.Consumer L.Rptr. 174 (1999); author of *Consumer Fraud and Insurance Claims*, in Bad Faith and Extracontractual Damage Claims in Insurance Litigation, Chicago Bar Ass'n 1992; co-author of Chapter 8, "Fair Debt Collection Practices Act," *Ohio Consumer Law* (1995 ed.); co-author of *Fair Debt Collection: The Need for Private Enforcement*, 7 Loy.Consumer L.Rptr. 89 (1995); author of *An Overview of The Fair Debt Collection Practices Act*, in Financial Services Litigation, Practising Law Institute (1999); co-author of *Residential Mortgage Litigation*, in Financial Services Litigation, Practising Law Institute (1996); author of *Automobile Leasing: Problems and Solutions*, 7 Loy.Consumer L.Rptr. 14 (1994); author of *Current Trends in Residential Mortgage Litigation*, 12 Rev. of Banking & Financial Services 71 (April 24, 1996); co-author of *Illinois Consumer Law* (Chicago Bar Ass'n 1996); co-author of D. Edelman and M. A. Weinberg, *Attorney Liability Under the Fair Debt Collection Practices Act* (Chicago Bar Ass'n 1996); and author of *The Fair Debt Collection Practices Act: Recent Developments*, 8 Loy.Consumer L. Rptr. 303 (1996), among others. Mr. Edelman is also a frequent speaker on consumer law topics for various legal organizations including the Chicago Bar Association, the National Consumer Law Center's Consumer Rights Litigation Conference, and the Illinois Institute for Continuing Legal Education, and he has testified on behalf of consumers before the Federal Trade Commission and

the Illinois legislature. He is a member of the Illinois bar and admitted to practice in the following courts: United States Supreme Court, Seventh Circuit Court of Appeals, First Circuit Court of Appeals, Second Circuit Court of Appeals, Third Circuit Court of Appeals, Fifth Circuit Court of Appeals, Sixth Circuit Court of Appeals, Eighth Circuit Court of Appeals, Ninth Circuit Court of Appeals, Tenth Circuit Court of Appeals, Eleventh Circuit Court of Appeals, United States District Courts for the Northern and Southern Districts of Indiana, United States District Courts for the Northern, Central, and Southern Districts of Illinois, United States District Courts for the Eastern and Western Districts of Wisconsin, and the Supreme Court of Illinois. He is a member of the Northern District of Illinois trial bar.

3. **Cathleen M. Combs** is a 1976 graduate of Loyola University Law School. From 1984-1991, she supervised the Northwest office of the Legal Assistance Foundation of Chicago, where she was lead or co-counsel in class actions in the areas of unemployment compensation, prison law, social security law, and consumer law. She joined what is now Edelman, Combs, Lattuner & Goodwin, LLC in early 1991 and became a named partner in 1993. Ms. Combs received an Award for Excellence in Pro Bono Service from the Judges of the United States District Court for the Northern District of Illinois and the Chicago Chapter of the Federal Bar Association on May 18, 2012. Ms. Combs has argued over fifteen cases in the 1st, 3rd and 7th Circuit Court of Appeals and the Illinois Appellate Court, and she is a frequent speaker on consumer law topics at various legal organizations including the Chicago Bar Association, the National Consumer Law Center's Consumer Rights Litigation Conferences, and the Practising Law Institute's Consumer Financial Services Institute. Ms. Combs is coauthor of *The Bankruptcy Practitioner's Guide to Consumer Financial Services Actions After the Subprime Mortgage Crisis* (LRP Publications 2010). Her reported decisions include: *Suesz v. Med-1 Solutions, LLC*, 757 F.3d 636 (7th Cir. 2014) (en banc); *Siwulec v. J.M. Adjustment Servs., LLC*, 465 Fed. Appx. 200 (3d Cir. 2012); *Nielsen v. Dickerson*, 307 F.3d 623 (7th Cir. 2002); *Chandler v. American General Finance, Inc.*, 329 Ill. App.3d 729, 768 N.E.2d 60 (1st Dist. 2002); *Miller v. McCalla Raymer*, 214 F.3d 872 (7th Cir. 2000); *Bessette v. Avco Financial Services*, 230 F.3d 439 (1st Cir. 2000); *Emery v. American Gen. Fin., Inc.*, 71 F.3d 1343 (7th Cir. 1995); *McDonald v. Asset Acceptance, LLC*, 296 F.R.D. 513 (E.D.Mich. 2013); and *Tocco v. Real Time Resolutions*, ___ F.Supp.2d ___, 1:14CV810, 2014 WL 3964948 (S.D.N.Y., Aug. 13, 2014). She is a member of the Illinois bar and admitted to practice in the following courts: United States District Courts for the Northern, Central and Southern Districts of Illinois, United States District Courts for the Northern and Southern Districts of Indiana, Seventh Circuit Court of Appeals, Third Circuit Court of Appeals, Fifth Circuit Court of Appeals, Tenth Circuit Court of Appeals, and United States District Court for the District of Colorado. She is a member of the Northern District of Illinois trial bar.

4. **James O. Lattuner** is a 1962 graduate of the University of Chicago Law School. Until 1969, he was an associate and then a partner at the Chicago law firm of Berchem, Schwanes & Thuma. From 1969 to 1995 he was Deputy Director of the Legal Assistance Foundation of Chicago, where he specialized in consumer law, including acting as lead counsel in over 30 class actions. His publications include Chapter 8 ("Defendants") in *Federal Practice Manual for Legal Services Attorneys* (M. Masinter, Ed., National Legal Aid and Defender Association 1989); *Governmental Tort Immunity in Illinois*, 55 Ill.B.J. 29 (1966); *Illinois Should Explicitly Adopt the Per Se Rule for Consumer Fraud Act Violations*, 2 Loy.Consumer L.Rep. 64 (1990), and *Illinois Consumer Law* (Chicago Bar Ass'n 1996). He has taught in a nationwide series of 18 Federal Practice courses sponsored by the Legal Services Corporation, each lasting four days and designed for attorneys with federal litigation experience. He has argued over 30 appeals, including two cases in the United States Supreme Court, three in the Illinois Supreme Court, and numerous cases in the Seventh, Third, Fifth, and Eleventh Circuits. Mr. Lattuner was involved in many of the significant decisions establishing the rights of Illinois consumers.

He is a member of the Northern District of Illinois trial bar.

5. **Tara L. Goodwin** is a graduate of the University of Chicago (B.A., with general honors, 1988) and Illinois Institute of Technology, Chicago-Kent College of Law (J.D., with high honors, 1991). Ms. Goodwin was Chair of the Chicago Bar Association's Consumer Law Committee from 2007 - 2010, and she has been on the faculty of the Practising Law Institute's Consumer Financial Services Institute in Chicago for the past few years, speaking on issues relating to the Fair Debt Collection Practices Act and mortgage litigation. Ms. Goodwin is also a frequent speaker at the Chicago Bar Association, speaking on topics such as how to assist consumers with credit reporting problems. **Reported Cases.** *Williams v. Chartwell Financial Services, Ltd.*, 204 F.3d 748 (7th Cir. 2000); *Hillenbrand v. Meyer Medical Group*, 288 Ill.App.3d 871, 682 N.E.2d 101 (1st Dist. 1997), later opinion, 308 Ill.App.3d 381, 720 N.E.2d 287 (1st Dist. 1999); *Bessette v. Avco Fin. Servs.*, 230 F.3d 439 (1st Cir. 2000); *Large v. Conseco Fin. Servicing Co.*, 292 F.3d 49 (1st Cir. 2002); *Flippin v. Aurora Bank, FSB*, 12 C 1996, 2012 WL 3260449, 2012 U.S. Dist. LEXIS 111250 (N.D.Ill. Aug. 8, 2012); *Henry v. Teletrack, Inc.*, 11 C 4424, 2012 WL 769763, 2012 U.S. Dist. LEXIS 30495 (N.D.Ill. March 7, 2012); *Kesten v. Ocwen Loan Servicing, LLC*, 11 C 6981, 2012 WL 426933, 2012 U.S. Dist. LEXIS 16917 (N.D.Ill. Feb. 9, 2012); *Bunton v. Cape Cod Village, LLC*, No. 09-1044, 2009 WL 2139441, 2009 U.S. Dist. LEXIS 57801 (C.D.Ill. July 6, 2009); *Wilson v. Harris N.A.*, No. 06 C 5840, 2007 WL 2608521, 2007 U.S. Dist. LEXIS 65345 (N.D.Ill. Sept. 4, 2007); *Carbajal v. Capital One*, 219 F.R.D. 437 (N.D.Ill. 2004); *Russo v. B&B Catering*, 209 F.Supp.2d 857 (N.D.Ill. 2002); *Romaker v. Crossland Mtg. Co.*, No. 94 C 3328, 1996 WL 254299, 1996 U.S. Dist. LEXIS 6490 (N.D.Ill. May 10, 1996); *Mount v. LaSalle Bank Lake View*, 926 F.Supp. 759 (N.D.Ill. 1996). Ms. Goodwin is a member of the Illinois bar and is admitted in the Seventh, First, and D.C. Circuit Courts of Appeals, and the United States District Courts for the Northern and Central Districts of Illinois, and the Northern District of Indiana. She is also a member of the Northern District of Illinois trial bar.

6. **Francis R. Greene** is a graduate of Johns Hopkins University (B.A. 1984), Rutgers University (Ph.D. 1991), and Northwestern University Law School (J.D., 2000). Mr. Greene was Chair of the Chicago Bar Association's Consumer Law Committee from 2011-2012 and Vice-Chair from 2010-11. **Reported Cases:** *Janetos v. Fulton, Friedman & Gullace, LLP*, 15-1859, 2016 WL 1382174 (7th Cir. 2016); *Phillips v. Asset Acceptance, LLC*, 736 F.3d 1076 (7th Cir. 2013); *Soppet v. Enhanced Recovery Co.*, 679 F.3d 637 (7th Cir. 2012); *Ruth v. Triumph Partnerships*, 577 F.3d 790 (7th Cir. 2009); *Handy v. Anchor Mortgage Corp.*, 464 F.3d 760 (7th Cir. 2006); *Tri-G, Inc. v. Burke, Bosselman & Weaver*, 222 Ill.2d 218, 856 N.E.2d 389 (2006); *Johnson v. Thomas*, 342 Ill.App.3d 382, 794 N.E.2d 919 (1st Dist. 2003); *Hale v. Afni, Inc.*, 08 C 3918, 2010 WL 380906, 2010 U.S. Dist. LEXIS 6715 (N.D.Ill. Jan. 26, 2010); *Parkis v. Arrow Fin Servs.*, 07 C 410, 2008 WL 94798, 2008 U.S. Dist. LEXIS 1212 (N.D.Ill. Jan. 8, 2008); *Foster v. Velocity Investments*, 07 C 824, 2007 WL 2461665, 2007 U.S. Dist. LEXIS 63302 (N.D. Ill. Aug. 24, 2007); *Foreman v. PRA III, LLC*, 05 C 3372, 2007 WL 704478, 2007 U.S. Dist. LEXIS 15640 (N.D. Ill. March 5, 2007); *Schutz v. Arrow Fin. Services*, 465 F. Supp. 2d 872 (N.D.Ill. 2006); *Pleasant v. Risk Management Alternatives*, 02 C 6886, 2003 WL 22175390 (N.D.Ill. Sept. 19, 2003). He is a member of the Illinois Bar and is admitted to practice in the Seventh Circuit Court of Appeals, the United States District Courts for the Northern, Central, and Southern Districts of Illinois, Eastern District of Wisconsin, Northern District of Indiana, and Western District of Texas. He is a member of the Northern District of Illinois Trial Bar.

7. **Julie Clark** (née Cobalovic) is a graduate of Northern Illinois University (B.A., 1997) and DePaul University College of Law (J.D., 2000). **Reported Cases:** *Record-A-Hit, Inc. v. Nat'l. Fire Ins. Co.*, 377 Ill. App. 3d 642; 880 N.E.2d 205 (1st Dist. 2007); *Qualkenbush v.*

Harris Trust & Savings Bank, 219 F. Supp.2d 935 (N.D.Ill. 2002); *Covington-McIntosh v. Mount Glenwood Memory Gardens*, 00 C 186, 2002 WL 31369747 (N.D.Ill., Oct. 21, 2002), later opinion, 2003 WL 22359626 (N.D.Ill. Oct. 15, 2003); *Western Ry. Devices Corp. v. Lusida Rubber Prods.*, 06 C 52, 2006 WL 1697119, 2006 U.S. Dist. LEXIS 43867 (N.D.Ill. June 13, 2006); *Nautilus Ins. Co. v. Easy Drop Off, LLC*, 06 C 4286, 2007 U.S. Dist. LEXIS 42380 (N.D.Ill. June 4, 2007); *Ballard Nursing Center, Inc. v. GF Healthcare Products, Inc.*, 07 C 5715, 2007 WL 3448731, 2007 U.S. Dist. LEXIS 84425 (N.D.Ill. Nov. 14, 2007); *Sadowski v. Med1 Online, LLC*, 07 C 2973, 2008 WL 2224892, 2008 U.S. Dist. LEXIS 41766 (N.D.Ill. May 17, 2008); *Sadowski v. OCO Biomedical, Inc.*, 08 C 3225, 2008 WL 5082992, 2008 U.S. Dist. LEXIS 96124 (N.D.Ill. Nov. 25, 2008); *ABC Bus. Forms, Inc. v. Pridamor, Inc.*, 09 C 3222, 2009 WL 4679477, 2009 U.S. Dist. LEXIS 113847 (N.D.Ill. Dec. 1, 2009); *Glen Ellyn Pharmacy v. Promius Pharma, LLC*, 09 C 2116, 2009 WL 2973046, 2009 U.S. Dist. LEXIS 83073 (N.D.Ill. Sept. 11, 2009); *Garrett v. Ragle Dental Lab., Inc.*, 10 C 1315, 2010 WL 4074379, 2010 U.S. Dist. LEXIS 108339 (N.D.Ill. Oct. 12, 2010); *Garrett v. Sharps Compliance, Inc.*, 10 C 4030, 2010 WL 4167157, 2010 U.S. Dist. LEXIS 109912 (N.D.Ill. Oct. 14, 2010).

8. **Heather A. Kolbus** (né Piccirilli) is a graduate of DePaul University (B.S. *cum laude*, 1997), and Roger Williams University School of Law (J.D., 2002). **Reported Cases:** *Clark v. Experian Info. Solutions, Inc.*, 8:00cv1217-22, 2004 WL 256433, 2004 U.S. Dist. LEXIS 28324 (D.S.C., Jan. 14, 2004); *DeFrancesco v. First Horizon Home Loan Corp.*, 06-0058, 2006 WL 3196838, 2006 U.S. Dist. LEXIS 80718 (S.D.Ill. Nov. 2, 2006); *Jeppesen v. New Century Mortgage Corp.*, 2:05cv372, 2006 WL 3354691, 2006 U.S. Dist. LEXIS 84035 (N.D.Ind. Nov. 17, 2006); *Benedia v. Super Fair Cellular, Inc.*, 07 C 1390, 2007 WL 2903175, 2007 U.S. Dist. LEXIS 71911 (N.D.Ill. Sept. 26, 2007); *Gonzalez v. Codilis & Assocs., P.C.*, 03 C 2883, 2004 WL 719264, 2004 U.S. Dist. LEXIS 5463 (N.D.Ill. March 30, 2004); *Centerline Equipment Corp. v. Banner Personnel Svc., Inc.*, 07 C 1611, 2009 WL 1607587, 2009 U.S. Dist. LEXIS 48092 (N.D.Ill. June 9, 2009); *R. Rudnick & Co. v. G.F. Protection, Inc.*, 08 C 1856, 2009 WL 112380, 2009 U.S. Dist. LEXIS 3152 (N.D.Ill. Jan. 15, 2009); *Pollack v. Cunningham Financial Group, LLC*, 08 C 1405, 2008 WL 4874195, 2008 U.S. Dist. LEXIS 4166 (N.D.Ill. June 2, 2008); *Pollack v. Fitness Innovative Techs., LLC*, No. 08 CH 03430, 2009 WL 506280, 2009 TCPA Rep. 1858 (Ill. Cir. Ct., Jan. 14, 2009); *R. Rudnick & Co. v. Brilliant Event Planning, Inc.*, No. 09 CH 18924, 2010 WL 5774848, 2010 TCPA Rep. 2099 (Ill. Cir. Ct., Nov. 30, 2010).

9. **Cassandra P. Miller** is a graduate of the University of Wisconsin – Madison (B.A. 2001) and John Marshall Law School (J.D. *magna cum laude* 2006). **Reported Cases:** *Pietras v. Sentry Ins. Co.*, 513 F.Supp.2d 983 (N.D.Ill. 2007); *Hernandez v. Midland Credit Mgmt.*, 04 C 7844, 2007 WL 2874059, 2007 U.S. Dist. LEXIS 16054 (N.D.Ill. Sept. 25, 2007); *Balogun v. Midland Credit Mgmt.*, 1:05cv1790, 2007 WL 2934886, 2007 U.S. Dist. LEXIS 74845 (S.D.Ind. Oct. 5, 2007); *Herkert v. MRC Receivables Corp.*, 655 F. Supp. 2d 870 (N.D.Ill. 2008); *Miller v. Midland Credit Management, Inc.*, No. 08 C 780, 2009 WL 528796, 2009 U.S. Dist. LEXIS 16273 (N.D.Ill. March 2, 2009); *Frydman v. Portfolio Recovery Associates, LLC*, 11 C 524, 2011 WL 2560221, 2011 U.S. Dist. LEXIS 69502 (N.D.Ill. June 28, 2011).

10. **Tiffany N. Hardy** is a graduate of Tuskegee University (B.A. 1998) and Syracuse University College of Law (J.D. 2001). **Reported cases:** *Unifund v. Shah*, 407 Ill.App.3d 737, 946 N.E.2d 885 (1st Dist. 2011), later opinion, 2013 IL App (1st) 113658, 993 N.E.2d 518; *Tocco v. Real Time Resolutions*, 14cv810, 2014 WL 3964948 (S.D.N.Y., Aug. 13, 2014); *Balbarin v. North Star*, 10 C 1846, 2011 WL 211013, 2011 U.S. Dist. LEXIS 686 (N.D.Ill. Jan. 5, 2011)(class certified); *Diaz v. Residential Credit Solutions, Inc.*, 965 F.Supp.2d 249 (E.D.N.Y. 2013), later opinion, 297 F.R.D. 42 (E.D.N.Y. 2014), later opinion, 299 F.R.D.

16 (E.D.N.Y. 2014); *Manlapaz v. Unifund*, 08 C 6524, 2009 WL 3015166, 2009 U.S. Dist. LEXIS 85527 (N.D.Ill. Sept. 15, 2009); *Matmanivong v. Unifund*, 08 C 6415, 2009 WL 1181529, 2009 U.S. Dist. LEXIS 36287 (N.D.Ill. Apr. 28, 2009); *Kubiski v. Unifund*, 08 C 6421, 2009 WL 774450, 2009 U.S. Dist. LEXIS 26754 (N.D.Ill. Mar. 25, 2009); *Cox v. Unifund CCR Partners*, 08 C 1005 (N.D.Ill. Dec. 4, 2008) (Report and Recommendation for Class Certification); *Ramirez v. Palisades Collection LLC*, 250 F.R.D. 366 (N.D.Ill. 2008) (class certified), later opinion, 07 C 3840, 2008 WL 2512679, 2008 U.S. Dist. LEXIS 48722 (N.D.Ill., June 23, 2008) (summary judgment denied); *Cotton v. Asset Acceptance*, 07 C 5005, 2008 WL 2561103, 2008 U.S. Dist. LEXIS 49042 (N.D.Ill. June 26, 2008) (class certified); *Ketchem v. American Acceptance Co.*, 641 F. Supp. 2d 782 (N.D.Ind. 2008); *D'Elia v. First Capital*, 07 C 6042, 2008 WL 4344571, 2008 U.S. Dist. LEXIS 22461 (N.D.Ill. Mar. 19, 2008). She is admitted in New York and the District of Columbia as well as Illinois.

11. **Associates:**

a. **Emiliya Gumin Farbstein** is a graduate of the University of Illinois at Urbana-Champaign (B.S.B.A. 2006) and University of Minnesota Law School (J.D., magna cum laude, 2012).

b. **Michelle Alyea** is a graduate of Valparaiso University (B.A., 1998, M.A., 2009) and Valparaiso University School of Law (J.D., 2012). She is admitted in Illinois and Indiana.

c. **Sarah Barnes** is a graduate of Michigan State University (B.A. 2010) and Chicago-Kent College of Law (J.D., 2015).

12. The firm also has 10 legal assistants, as well as other support staff.

13. Since its inception, the firm has recovered more than \$500 million for consumers. The types of cases handled by the firm are illustrated by the following:

14. **Collection practices:** The firm has brought numerous cases under the Fair Debt Collection Practices Act, both class and individual. Decisions include: *Jenkins v. Heintz*, 25 F.3d 536 (7th Cir. 1994), aff'd 514 U.S. 291 (1995) (FDCPA coverage of attorneys); *Suesz v. Med-1 Solutions, LLC*, 757 F.3d 636 (7th Cir. 2014)(en banc); *McMahon v. LVNV Funding, LLC*, 744 F.3d 1010 (7th Cir. 2014), later opinion, 807 F.3d 872 (7th Cir. 2015) (collection of time-barred debts); *Siwulec v. J.M. Adjustment Servs., LLC*, 465 Fed. Appx. 200 (3d Cir. 2012); (activities of mortgage company field agents); *Fields v. Wilber Law Firm, P.C.*, 383 F.3d 562 (7th Cir. 2004); *Schlusser v. Fairbanks Capital Corp.*, 323 F.3d 534 (7th Cir. 2003) (FDCPA coverage of debt buyers); *Peter v. GC Servs. L.P.*, 310 F.3d 344 (5th Cir. 2002); *Nielsen v. Dickerson*, 307 F.3d 623 (7th Cir. 2002) (attorney letters without attorney involvement); *Boyd v. Wexler*, 275 F.3d 642 (7th Cir. 2001); *Miller v. McCalla, Raymer, Padrick, Cobb, Nichols, & Clark, L.L.C.*, 214 F.3d 872 (7th Cir. 2000); *Johnson v. Revenue Management, Inc.*, 169 F.3d 1057 (7th Cir.1999); *Keele v. Wexler & Wexler*, 95 C 3483, 1995 WL 549048, 1995 U.S. Dist. LEXIS 13215 (N.D.Ill. Sept. 12, 1995) (motion to dismiss), later opinion, 1996 WL 124452, 1996 U.S. Dist. LEXIS 3253 (N.D.Ill., March 18, 1996) (class), aff'd, 149 F.3d 589 (7th Cir. 1998); *Mace v. Van Ru Credit Corp.*, 109 F.3d 338 (7th Cir. 1997); *Maguire v. Citicorp Retail Services, Inc.*, 147 F.3d 232 (2nd Cir. 1998); *Young v. Citicorp Retail Services, Inc.*, No. 97-9397, 1998 U.S. App. LEXIS 20268, 159 F.3d 1349 (2nd Cir., June 29, 1998) (unpublished); *Charles v. Lundgren & Assocs., P.C.*, 119 F.3d 739 (9th Cir. 1997); *Avila v. Rubin*, 84 F.3d 222 (7th Cir. 1996), aff'g *Avila v. Van Ru Credit Corp.*, 94 C 3234, 1994 WL 649101 (N.D.Ill., Nov. 14, 1994), later opinion, 1995 WL 22866 (N.D.Ill., Jan. 18, 1995), later opinion, 1995 WL

41425 (N.D.Ill., Jan. 31, 1995), later opinion, 1995 WL 55255 (N.D.Ill., Feb. 8, 1995), later opinion, 1995 WL 683775, 1995 U.S. Dist. LEXIS 17117 (N.D.Ill., Nov. 16, 1995); *Tolentino v. Friedman*, 833 F.Supp. 697 (N.D.Ill. 1993), aff'd in part and rev'd in part, 46 F.3d 645 (7th Cir. 1995); *Diaz v. Residential Credit Solutions, Inc.*, 965 F.Supp.2d 249 (E.D.N.Y. 2013), later opinion, 297 F.R.D. 42 (E.D.N.Y. 2014), later opinion, 299 F.R.D. 16 (E.D.N.Y. 2014); *Stubbs v. Cavalry SPV I*, 12 C 7235, 2013 WL 1858587 (N.D.Ill., May 1, 2013); *Osborn v. J.R.S.-I, Inc.*, 13 C 621, 2013 WL 2467654 (N.D.Ill., June 7, 2013); *Terech v. First Resolution Mgmt. Corp.*, 854 F.Supp.2d 537, 544 (N.D.Ill. 2012); *Casso v. LVNV Funding, LLC*, 12 C 7328, 2013 WL 3270654 (N.D.Ill., June 26, 2013); *Simkus v. Cavalry Portfolio Services, LLC*, 11 C 7425, 2012 WL 1866542 (N.D.Ill., May 22, 2012); *McDonald v. Asset Acceptance LLC*, 296 F.R.D. 513 (E.D.Mich. 2013); *Ramirez v. Apex Financial Management, LLC*, 567 F. Supp.2d 1035 (N.D. Ill. 2008); *Cotton v. Asset Acceptance, LLC*, 07 C 5005, 2008 WL 2561103, 2008 U.S. Dist. LEXIS 49042 (N.D.Ill., June 26, 2008); *Buford v. Palisades Collection, LLC*, 552 F. Supp. 2d 800 (N.D.Ill. 2008); *Martin v. Cavalry Portfolio Servs., LLC*, 07 C 4745, 2008 WL 4372717, 2008 U.S. Dist. LEXIS 25904 (N.D.Ill., March 28, 2008); *Ramirez v. Palisades Collection LLC*, 250 F.R.D. 366 (N.D.Ill. 2008) (class certified), later opinion, 07 C 3840, 2008 WL 2512679, 2008 U.S. Dist. LEXIS 48722 (N.D.Ill., June 23, 2008) (summary judgment denied); *Hernandez v. Midland Credit Mgmt.*, 04 C 7844, 2007 WL 2874059, 2007 U.S. Dist. LEXIS 16054 (N.D.Ill., Sept. 25, 2007) (balance transfer program); *Blakemore v. Pekay*, 895 F.Supp.972 (N.D.Ill. 1995); *Oglesby v. Rotche*, 93 C 4183, 1993 WL 460841, 1993 U.S. Dist. LEXIS 15687 (N.D.Ill., Nov. 5, 1993), later opinion, 1994 U.S. Dist. LEXIS 4866, 1994 WL 142867 (N.D.Ill., April 18, 1994); *Laws v. Cheslock*, 98 C 6403, 1999 WL 160236, 1999 U.S. Dist. LEXIS 3416 (N.D.Ill., Mar. 8, 1999); *Davis v. Commercial Check Control, Inc.*, 98 C 631, 1999 WL 89556, 1999 U.S. Dist. LEXIS 1682 (N.D.Ill., Feb. 12, 1999); *Hoffman v. Partners in Collections, Inc.*, 93 C 4132, 1993 WL 358158, 1993 U.S. Dist. LEXIS 12702 (N.D.Ill., Sept. 15, 1993); *Vaughn v. CSC Credit Services, Inc.*, 93 C 4151, 1994 WL 449247, 1994 U.S. Dist. LEXIS 2172 (N.D.Ill., March 1, 1994), adopted, 1995 WL 51402, 1995 U.S. Dist. LEXIS 1358 (N.D.Ill., Feb. 3, 1995); *Beasley v. Blatt*, 93 C 4978, 1994 WL 362185, 1994 U.S. Dist. LEXIS 9383 (N.D.Ill., July 11, 1994); *Taylor v. Fink*, 93 C 4941, 1994 WL 669605, 1994 U.S. Dist. LEXIS 16821 (N.D.Ill., Nov. 23, 1994); *Gordon v. Fink*, 93 C 4152, 1995 WL 55242, 1995 U.S. Dist. LEXIS 1509 (N.D.Ill., Feb. 7, 1995); *Brujis v. Shaw*, 876 F.Supp. 198 (N.D.Ill. 1995).

15. *Jenkins v. Heintz* is a leading decision regarding the liability of attorneys under the Fair Debt Collection Practices Act. Mr. Edelman argued it before the Supreme Court and Seventh Circuit. *Avila v. Rubin* and *Nielsen v. Dickerson* are leading decisions on phony "attorney letters." *Suesz v. Med-1 Solutions, LLC* is a leading decision on the FDCPA venue requirements. *McMahon v. LVNV Funding, LLC* is a leading decision on the collection of time-barred debts.

16. **Debtors' rights.** Important decisions include: *Ramirez v. Palisades Collection LLC*, 250 F.R.D. 366 (N.D.Ill. 2008) (class certified), later opinion, 07 C 3840, 2008 WL 2512679, 2008 U.S. Dist. LEXIS 48722 (N.D.Ill., June 23, 2008) (summary judgment denied); *z* (Illinois statute of limitations for credit card debts); *Parkis v. Arrow Fin Servs.*, 07 C 410, 2008 WL 94798, 2008 U.S. Dist. LEXIS 1212 (N.D.Ill. Jan. 8, 2008); *Rawson v. Credigy Receivables, Inc.*, 05 C 6032, 2006 WL 418665, 2006 U.S. Dist. LEXIS 6450 (N.D.Ill., Feb. 16, 2006) (same); *McMahon v. LVNV Funding, LLC*, 744 F.3d 1010 (7th Cir. 2014) (collection of time-barred debts without disclosure); *Jones v. Kunin*, 99-818-GPM, 2000 WL 34402017, 2000 U.S. Dist. LEXIS 6380 (S.D.Ill., May 1, 2000) (scope of Illinois bad check statute); *Qualkenbush v. Harris Trust & Sav. Bank*, 219 F. Supp. 2d 935 (N.D.Ill. 2002) (failure to allow cosigner to take over obligation prior to collection action); *Suesz v. Med-1 Solutions, LLC*, 757 F.3d 636 (7th Cir. 2014) (en banc) (venue abuse).

17. **Telephone Consumer Protection Act.** The firm has brought a number of cases under the Telephone Consumer Protection Act, 47 U.S.C. §227, which prohibits “junk faxes,” spam text messages, robocalls to cell phones, and regulates telemarketing practices. Important junk fax and spam text message decisions include: *Brill v. Countrywide Home Loans, Inc.*, 427 F.3d 446 (7th Cir. 2005); *Sadowski v. Med1 Online, LLC*, 07 C 2973, 2008 WL 2224892, 2008 U.S. Dist. LEXIS 41766 (N.D.Ill., May 27, 2008); *Benedia v. Super Fair Cellular, Inc.*, 07 C 01390, 2007 WL 2903175, 2007 U.S. Dist. LEXIS 71911 (N.D.Ill., Sept. 26, 2007); *Centerline Equip. Corp. v. Banner Pers. Serv.*, 545 F. Supp. 2d 768 (N.D.Ill. 2008); *ABC Business Forms, Inc. v. Pridamor, Inc.*, 09 C 3222, 2009 WL 4679477, 2009 U.S. Dist. LEXIS 113847 (N.D.Ill. Dec. 1, 2009); *Glen Ellyn Pharmacy, Inc. v. Promius Pharma, LLC*, 09 C 2116, 2009 WL 2973046, 2009 U.S. Dist. LEXIS 83073 (N.D.Ill. Sept. 11, 2009); *Garrett v. Ragle Dental Laboratory, Inc.*, 10 C 1315, 2010 WL 3034709, 2010 U.S. Dist. LEXIS, 108339 (N.D.Ill., Aug. 3, 2010).

18. The firm has also brought a number of cases complaining of robocalling and telemarketing abuse, in violation of the Telephone Consumer Protection Act. Decisions in these cases include: *Soppet v. Enhanced Recovery Co.*, 679 F.3d 637 (7th Cir. 2012); *Balbarin v. North Star Capital Acquisition, LLC*, 10 C 1846, 2011 WL 211013, 2011 U.S. Dist. LEXIS 686 (N.D.Ill. Jan. 21, 2011), *motion to reconsider denied*, 2011 U.S. Dist. LEXIS 58761 (N.D.Ill. 2011); *Sojka v. DirectBuy, Inc.*, 12 C 9809 et al., 2014 WL 1089072 (N.D.Ill., Mar. 18, 2014), later opinion, 2014 WL 1304234 (N.D.Ill., March 31, 2014). The firm has a leadership role in Portfolio Recovery Associates, LLC, Telephone Consumer Protection Act Litigation, MDL No. 2295, and Midland Credit Management, Inc., Telephone Consumer Protection Act Litigation, MDL No. 2286.

19. **Fair Credit Reporting Act:** The firm has filed numerous cases under the Fair Credit Reporting Act, which include: *Henry v. Teletrack, Inc.*, 11 C 4424, 2012 WL 769763, 2012 U.S. Dist. LEXIS 30495 (N.D.Ill. March 7, 2012).

20. Another line of cases under the Fair Credit Reporting Act which we have brought, primarily as class actions, alleges that lenders and automotive dealers, among others, improperly accessed consumers’ credit information, without their consent and without having a purpose for doing so permitted by the FCRA. *Cole v. U.S. Capital, Inc.*, 389 F.3d 719 (7th Cir. 2004); *Murray v. GMAC Mortgage Corp.*, 434 F.3d 948 (7th Cir. 2006); *Perry v. First National Bank*, 459 F.3d 816 (7th Cir. 2006).

21. **Class action procedure:** Important decisions include *McMahon v. LVNV Funding, LLC*, 807 F.3d 872 (7th Cir. 2015); *Phillips v. Asset Acceptance, LLC*, 736 F.3d 1076 (7th Cir. 2013); *Crawford v. Equifax Payment Services, Inc.*, 201 F.3d 877 (7th Cir. 2000); *Blair v. Equifax Check Services, Inc.*, 181 F.3d 832 (7th Cir. 1999); *Mace v. Van Ru Credit Corp.*, 109 F.3d 338, 344 (7th Cir. 1997); *McMahon v. LVNV Funding, LLC*, 744 F.3d 1010 (7th Cir. 2014) (mootness); *Ballard RN Center, Inc. v. Kohll’s Pharmacy and Homecare, Inc.*, 2015 IL 118644 (Ill.Sup.Ct., October 22, 2015)(mootness), and *Gordon v. Boden*, 224 Ill.App.3d 195, 586 N.E.2d 461 (1st Dist. 1991).

22. **Landlord-tenant:** The firm has brought more than 20 class actions against landlords to enforce tenants’ rights. Claims include failing to pay interest on security deposits or commingling security deposits. Reported decisions include *Wang v. Williams*, 343 Ill. App. 3d 495; 797 N.E.2d 179 (5th Dist. 2003); *Dickson v. West Koke Mill Vill. P’Ship*, 329 Ill. App. 3d 341; 769 N.E.2d 971 (4th Dist. 2002); and *Onni v. Apartment Inv. & Mgmt. Co.*, 344 Ill. App. 3d 1099; 801 N.E.2d 586 (2nd Dist. 2003).

23. **Mortgage charges and servicing practices:** The firm has been involved in dozens of cases, mostly class actions, complaining of illegal charges on mortgages and improper servicing practices. These include MDL-899, *In re Mortgage Escrow Deposit Litigation*, and MDL-1604, *In re Ocwen Federal Bank FSB Mortgage Servicing Litigation*, as well as the Fairbanks mortgage servicing litigation. Decisions in the firm's mortgage cases include: *Hamm v. Ameriquist Mortg. Co.*, 506 F.3d 525 (7th Cir. 2007); *Handy v. Anchor Mortgage Corp.*, 464 F.3d 760 (7th Cir. 2006); *Christakos v. Intercounty Title Co.*, 196 F.R.D. 496 (N.D.Ill. 2000); *Flippin v. Aurora Bank, FSB*, 12 C 1996, 2012 WL 3260449, 2012 U.S. Dist. LEXIS 111250 (N.D.Ill. Aug. 8, 2012); *Kesten v. Ocwen Loan Servicing, LLC*, 11 C 6981, 2012 WL 426933, 2012 U.S. Dist. LEXIS 16917 (N.D.Ill. Feb. 9, 2012); *Johnstone v. Bank of America, N.A.*, 173 F.Supp.2d 809 (N.D.Ill. 2001); *Leon v. Washington Mut. Bank, F.A.*, 164 F.Supp.2d 1034 (N.D.Ill. 2001); *Williamson v. Advanta Mortg. Corp.*, 99 C 4784, 1999 WL 1144940, 1999 U.S. Dist. LEXIS 16374 (N.D.Ill., Oct. 5, 1999); *McDonald v. Washington Mut. Bank, F.A.*, 99 C 6884, 2000 WL 875416, 2000 U.S. Dist. LEXIS 11496 (N.D.Ill., June 22, 2000); *GMAC Mtge. Corp. v. Stapleton*, 236 Ill.App.3d 486, 603 N.E.2d 767 (1st Dist. 1992), leave to appeal denied, 248 Ill.2d 641, 610 N.E.2d 1262 (1993); *Leff v. Olympic Fed. S. & L. Ass'n*, 86 C 3026, 1986 WL 10636 (N.D.Ill. Sept. 19, 1986); *Aitken v. Fleet Mtge. Corp.*, 90 C 3708, 1991 WL 152533, 1991 U.S. Dist. LEXIS 10420 (N.D.Ill. July 30, 1991), later opinion, 1992 WL 33926, 1992 U.S. Dist. LEXIS 1687 (N.D.Ill., Feb. 12, 1992); *Poindexter v. National Mtge. Corp.*, 94 C 45814, 1995 WL 242287, 1995 U.S. Dist. LEXIS 5396 (N.D.Ill., April 24, 1995); *Sanders v. Lincoln Service Corp.*, 91 C 4542, 1993 WL 1125433, 1993 U.S. Dist. LEXIS 4454 (N.D.Ill. April 5, 1993); *Robinson v. Empire of America Realty Credit Corp.*, 90 C 5063, 1991 WL 26593, 1991 U.S. Dist. LEXIS 2084 (N.D.Ill., Feb. 20, 1991); *In re Mortgage Escrow Deposit Litigation*, M.D.L. 899, 1994 WL 496707, 1994 U.S. Dist. LEXIS 12746 (N.D.Ill., Sept. 9, 1994); *Greenberg v. Republic Federal S. & L. Ass'n*, 94 C 3789, 1995 WL 263457, 1995 U.S. Dist. LEXIS 5866 (N.D.Ill., May 1, 1995).

24. The recoveries in the escrow overcharge cases alone are over \$250 million. *Leff* was the seminal case on mortgage escrow overcharges.

25. The escrow litigation had a substantial effect on industry practices, resulting in limitations on the amounts which mortgage companies held in escrow.

26. **Bankruptcy:** The firm brought a number of cases complaining that money was being systematically collected on discharged debts, in some cases through the use of invalid reaffirmation agreements, including the national class actions against Sears and General Electric. *Conley v. Sears, Roebuck*, 1:97cv11149 (D.Mass); *Fisher v. Lechmere Inc.*, 1:97cv3065 (N.D.Ill.). These cases were settled and resulted in recovery by nationwide classes. Cathleen Combs successfully argued the first Court of Appeals case to hold that a bankruptcy debtor induced to pay a discharged debt by means of an invalid reaffirmation agreement may sue to recover the payment. *Bessette v. Avco Financial Services*, 230 F.3d 439 (1st Cir. 2000).

27. **Automobile sales and financing practices:** The firm has brought many cases challenging practices relating to automobile sales and financing, including:

a. Hidden finance charges resulting from pass-on of discounts on auto purchases. *Walker v. Wallace Auto Sales, Inc.*, 155 F.3d 927 (7th Cir. 1998).

b. Misrepresentation of amounts disbursed for extended warranties. *Taylor v. Quality Hyundai, Inc.*, 150 F.3d 689 (7th Cir. 1998); *Grimaldi v. Webb*, 282 Ill.App.3d 174, 668 N.E.2d 39 (1st Dist. 1996), leave to appeal denied, 169 Ill.2d 566 (1996); *Slawson v. Currie Motors Lincoln Mercury, Inc.*, 94 C 2177, 1995 WL 22716, 1995 U.S. Dist. LEXIS 451 (N.D.Ill.,

Jan. 13, 1995); *Cirone-Shadow v. Union Nissan, Inc.*, 955 F.Supp. 938 (N.D.Ill. 1997) (same); *Chandler v. Southwest Jeep-Eagle, Inc.*, 162 F.R.D. 302 (N.D.Ill. 1995); *Shields v. Lefta, Inc.*, 888 F. Supp. 891 (N.D.Ill. 1995).

c. Spot delivery. *Janikowski v. Lynch Ford, Inc.*, 98 C 8111, 1999 WL 608714 (N.D.Ill., Aug. 5, 1999); *Diaz v. Westgate Lincoln Mercury, Inc.*, 93 C 5428, 1994 U.S. Dist. LEXIS 16300 (N.D.Ill. Nov. 14, 1994); *Grimaldi v. Webb*, 282 Ill.App.3d 174, 668 N.E.2d 39 (1st Dist. 1996), leave to appeal denied, 169 Ill.2d 566 (1996).

d. Force placed insurance. *Bermudez v. First of America Bank Champion, N.A.*, 860 F.Supp. 580 (N.D.Ill. 1994); *Travis v. Boulevard Bank*, 93 C 6847, 1994 U.S. Dist. LEXIS 14615 (N.D.Ill., Oct. 13, 1994), modified, 880 F.Supp. 1226 (N.D.Ill. 1995); *Moore v. Fidelity Financial Services, Inc.*, 884 F. Supp. 288 (N.D.Ill. 1995).

e. Improper obligation of cosigners. *Lee v. Nationwide Cassell*, 174 Ill.2d 540, 675 N.E.2d 599 (1996); *Taylor v. Trans Acceptance Corp.*, 267 Ill.App.3d 562, 641 N.E.2d 907 (1st Dist. 1994), leave to appeal denied, 159 Ill.2d 581, 647 N.E.2d 1017 (1995); *Qualkenbush v. Harris Trust & Sav. Bank*, 219 F. Supp. 2d 935 (N.D.Ill. 2002).

f. Evasion of FTC holder rule. *Brown v. LaSalle Northwest Nat'l Bank*, 148 F.R.D. 584 (N.D.Ill. 1993), later opinion, 820 F.Supp. 1078 (N.D.Ill. 1993), later opinion, 92 C 8392, 1993 U.S. Dist. LEXIS 11419 (N.D.Ill., Aug. 13, 1993).

28. These cases also had a substantial effect on industry practices. The warranty cases, such as *Grimaldi*, *Gibson*, *Slawson*, *Cirone-Shadow*, *Chandler*, and *Shields*, resulted in the Federal Reserve Board's revision of applicable disclosure requirements, so as to prevent car dealers from representing that the charge for an extended warranty was being disbursed to a third party when that was not in fact the case.

29. **Predatory lending practices:** The firm has brought numerous cases challenging predatory mortgage and "payday" lending practices, both as individual and class actions. *Jackson et al v. Payday Financial LLC et al*, 764 F.3d 765 (7th Cir. 2014), cert. denied, 135 S.Ct. 1894 (2015); *Livingston v. Fast Cash USA, Inc.*, 753 N.E.2d 572 (Ind. Sup. Ct. 2001); *Williams v. Chartwell Fin. Servs.*, 204 F.3d 748 (7th Cir. 2000); *Hamm v. Ameriquist Mortg. Co.*, 506 F.3d 525 (7th Cir. 2007); *Handy v. Anchor Mortg. Corp.*, 464 F.3d 760 (7th Cir. 2006); *Laseter v. Climateguard Design & Installation LLC*, 931 F.Supp.2d 862 (N.D.Ill. 2013); *Hubbard v. Ameriquist Mortg. Co.*, 624 F.Supp.2d 913 (N.D.Ill. 2008); *Martinez v. Freedom Mortg. Team, Inc.*, 527 F. Supp. 2d 827 (N.D.Ill. 2007); *Pena v. Freedom Mortg. Team, Inc.*, 07 C 552, 2007 WL 3223394, 2007 U.S. Dist. LEXIS 79817 (N.D.Ill., October 24, 2007); *Miranda v. Universal Fin. Group, Inc.*, 459 F. Supp. 2d 760 (N.D.Ill. 2006); *Parker v. 1-800 Bar None, a Financial Corp., Inc.*, 01 C 4488, 2002 WL 215530 (N.D.Ill., Feb. 12, 2002); *Gilkey v. Central Clearing Co.*, 202 F.R.D. 515 (E.D.Mich. 2001); *Van Jackson v. Check 'N Go of Illinois, Inc.*, 193 F.R.D. 544 (N.D.Ill. 2000), later opinion, 114 F. Supp. 2d 731 (N.D.Ill. 2000), later opinion, 123 F. Supp. 2d 1079 (N.D.Ill. 2000), later opinion, 123 F. Supp. 2d 1085 (N.D.Ill. 2000); *Henry v. Cash Today, Inc.*, 199 F.R.D. 566 (S.D.Tex. 2000); *Donnelly v. Illini Cash Advance, Inc.*, 00 C 94, 2000 WL 1161076, 2000 U.S. Dist. LEXIS 11906 (N.D.Ill., Aug. 14, 2000); *Jones v. Kunin*, 99-818-GPM, 2000 WL 34402017, 2000 U.S. Dist. LEXIS 6380 (S.D.Ill., May 1, 2000); *Davis v. Cash for Payday*, 193 F.R.D. 518 (N.D.Ill. 2000); *Reese v. Hammer Fin. Corp.*, 99 C 716, 1999 U.S. Dist. LEXIS 18812, 1999 WL 1101677 (N.D.Ill., Nov. 29, 1999); *Pinkett v. Moolah Loan Co.*, 99 C 2700, 1999 WL 1080596, 1999 U.S. Dist. LEXIS 17276 (N.D.Ill., Nov. 1, 1999); *Gutierrez v. Devon Fin. Servs.*, 99 C 2647, 1999 U.S. Dist. LEXIS 18696 (N.D.Ill., Oct. 6, 1999); *Vance v. National Benefit Ass'n*, 99 C 2627, 1999 WL 731764, 1999 U.S. Dist. LEXIS

13846 (N.D.Ill., Aug. 26, 1999).

30. **Other consumer credit issues:** The firm has also brought a number of other Truth in Lending and consumer credit cases, mostly as class actions, involving such issues as:

a. Phony nonfiling insurance. *Edwards v. Your Credit Inc.*, 148 F.3d 427 (5th Cir. 1998); *Adams v. Plaza Finance Co.*, 168 F.3d 932 (7th Cir. 1999); *Johnson v. Aronson Furniture Co.*, 96 C 117, 1997 U.S. Dist. LEXIS 3979 (N.D.Ill., March 31, 1997), later opinion, 1993 WL 641342 (N.D.Ill., Sept. 11, 1998).

b. The McCarran Ferguson Act exemption. *Autry v. Northwest Premium Services, Inc.*, 144 F.3d 1037 (7th Cir. 1998).

c. Loan flipping. *Emery v. American General*, 71 F.3d 1343 (7th Cir. 1995). *Emery* limited the pernicious practice of "loan flipping," in which consumers are solicited for new loans and are then refinanced, with "short" credits for unearned finance charges and insurance premiums being given through use of the "Rule of 78s."

d. Home improvement financing practices. *Fidelity Financial Services, Inc. v. Hicks*, 214 Ill.App.3d 398, 574 N.E.2d 15 (1st Dist. 1991), leave to appeal denied, 141 Ill.2d 539, 580 N.E.2d 112; *Heastie v. Community Bank of Greater Peoria*, 690 F.Supp. 716 (N.D.Ill. 1989), later opinion, 125 F.R.D. 669 (N.D.Ill. 1990), later opinions, 727 F.Supp. 1133 (N.D.Ill. 1990), and 727 F.Supp. 1140 (N.D.Ill. 1990).

e. Insurance packing. *Elliott v. ITT Corp.*, 764 F.Supp. 102 (N.D.Ill. 1990), later opinion, 150 B.R. 36 (N.D.Ill. 1992).

31. **Automobile leases:** The firm has brought a number of a cases alleging illegal charges and improper disclosures on automobile leases, mainly as class actions. Decisions in these cases include *Lundquist v. Security Pacific Automotive Financial Services Corp.*, 993 F.2d 11 (2d Cir. 1993); *Kedziora v. Citicorp Nat'l Services, Inc.*, 780 F.Supp. 516 (N.D.Ill. 1991), later opinion, 844 F.Supp. 1289 (N.D.Ill. 1994), later opinion, 883 F.Supp. 1144 (N.D.Ill. 1995), later opinion, 91 C 3428, 1995 U.S. Dist. LEXIS 12137 (N.D.Ill., Aug. 18, 1995), later opinion, 1995 U.S. Dist. LEXIS 14054 (N.D.Ill., Sept. 25, 1995); *Johnson v. Steven Sims Subaru and Subaru Leasing*, 92 C 6355, 1993 WL 761231, 1993 U.S. Dist. LEXIS 8078 (N.D.Ill., June 9, 1993), and 1993 WL 13074115, 1993 U.S. Dist. LEXIS 11694 (N.D.Ill., August 20, 1993); *McCarthy v. PNC Credit Corp.*, 2:91CV00854 (PCD), 1992 U.S. Dist. LEXIS 21719 (D.Conn., May 27, 1992); *Highsmith v. Chrysler Credit Corp.*, 18 F.3d 434 (7th Cir. 1994); *Simon v. World Omni Leasing Inc.*, 146 F.R.D. 197 (S.D.Ala. 1992).

32. *Lundquist* and *Highsmith* are leading cases; both held that commonly-used lease forms violated the Consumer Leasing Act. As a result of the *Lundquist* case, the Federal Reserve Board completely revamped the disclosure requirements applicable to auto leases, resulting in vastly improved disclosures to consumers.

33. **Insurance litigation:** Often securing recovery for a class requires enforcement of the rights under the defendant's insurance policy. The firm has extensive experience with such litigation. Reported decisions in such cases include: *Record-A-Hit, Inc. v. Nat'l Fire Ins. Co.*, 377 Ill. App. 3d 642; 880 N.E.2d 205 (1st Dist. 2007); *Pietras v. Sentry Ins. Co.*, 06 C 3576, 2007 WL 715759, 2007 U.S. Dist. LEXIS 16015 (N.D.Ill., March 6, 2007), later opinion, 513 F. Supp. 2d 983 (N.D.Ill. 2007); *Auto-Owners Ins. Co. v. Websolv Computing, Inc.*, 06 C 2092, 2007 WL 2608559, 2007 U.S. Dist. LEXIS 65339 (N.D.Ill., Aug. 31, 2007); *National Fire Ins.*

Co. v. Tri-State Hose & Fitting, Inc., 06 C 5256, 2007 U.S. Dist. LEXIS 45685 (N.D.Ill., June 21, 2007); *Nautilus Ins. Co. v. Easy Drop Off, LLC*, 06 C 4286, 2007 U.S. Dist. LEXIS 42380 (N.D.Ill., June 4, 2007).

34. Some of the other reported decisions in our cases include: *Elder v. Coronet Ins. Co.*, 201 Ill.App.3d 733, 558 N.E.2d 1312 (1st Dist. 1990); *Smith v. Keycorp Mtge., Inc.*, 151 B.R. 870 (N.D.Ill. 1992); *Gordon v. Boden*, 224 Ill.App.3d 195, 586 N.E.2d 461 (1st Dist. 1991), leave to appeal denied, 144 Ill.2d 633, 591 N.E.2d 21, cert. denied, U.S. (1992); *Armstrong v. Edelson*, 718 F.Supp. 1372 (N.D.Ill. 1989); *Newman v. 1st 1440 Investment, Inc.*, 89 C 6708, 1993 U.S.Dist. LEXIS 354 (N.D.Ill. Jan. 15, 1993); *Mountain States Tel. & Tel. Co.*, v. District Court, 778 P.2d 667 (Colo. 1989); *Harman v. Lyphomed, Inc.*, 122 F.R.D. 522 (N.D.Ill. 1988); *Haslam v. Lefta, Inc.*, 93 C 4311, 1994 WL 117463, 1994 U.S.Dist. LEXIS 3623 (N.D.Ill., March 25, 1994); *Source One Mortgage Services Corp. v. Jones*, 88 C 8441, 1994 WL 13664, 1994 U.S.Dist. LEXIS 333 (N.D.Ill., Jan. 13, 1994); *Wilson v. Harris N.A.*, 06 C 5840, 2007 WL 2608521, 2007 U.S. Dist. LEXIS 65345 (N.D.Ill. Sept. 4, 2007). *Wendorf v. Landers*, 755 F.Supp.2d 972 (N.D.Ill. 2010); *QuickClick Loans LLC v. Russell*, 407 Ill.App.3d 46; 943 N.E.2d 166 (1st Dist. 2011), *pet. denied*, 949 N.E.2d 1103 (2011) and *Adkins v. Nestle Purina Petcare Co.*, 973 F.Supp.2d 905 (N.D.Ill. 2013).

35. *Gordon v. Boden* is the first decision approving "fluid recovery" in an Illinois class action. *Elder v. Coronet Insurance* held that an insurance company's reliance on lie detectors to process claims was an unfair and deceptive trade practice.

36. The hourly rates for the attorneys set forth below, are the same as the regular current rates charged for their services in other contingent matters in class action litigation. They are also consistent with fees charged to occasional hourly paying clients. The firm adjusts them annually to account for inflation and increasing experience and they are consistent with the rates charged by attorneys of comparable experience and expertise in the Chicago area. The rates listed and used in this case represent rates previously approved in a number of cases plus an annual adjustment.

37. Examples of the approval of counsel's rates include:

a. The rates charged by Edelman, Combs, Lattuner & Goodwin, LLC were used as a benchmark by Judge Kennelly in *In re Southwest Airlines Voucher Litigation*, No. 11 C 8176, 2013 WL 5497275 (N.D.Ill., Oct. 3, 2013), at 19-20:

In particular, the Court has reviewed fee awards approved for the law firm of Edelman, Combs, Lattuner & Goodwin, a Chicago law firm that has a long-established practice in the same field as Siprut, PC, the firm representing the plaintiff class in this case. Here are some examples. In *Jablonski v. Riverwalk Holdings, Ltd.*, No. 11 C 840, 2012 WL 3043687, at *1 (N.D. Ill. July 12, 2012), Judge Blanche Manning approved rates of \$400 per hour for work done in 2011 by attorneys Daniel Edelman, Catherine Combs, and James Lattuner, who had, respectively, thirty-six, thirty-six, and fifty years of practice experience. *Id.* at *1. In 2009, in the case of *In re Trans Union Corp. Privacy Litig.*, No. 00 C 4729, 2009 WL 4799954, at *20 (N.D. Ill. Dec. 9, 2009), Judge Robert Gettleman appears to have okayed a \$550 rate for attorney Edelman. That same year, in *Jones v. Ameriquest Mortg. Co.*, No. 05 C 432, 2009 WL 631617, at *4 (N.D. Ill. Mar. 10, 2009), Judge David Coar approved rates of \$465 per hour for partners Lattuner, Combs, and Tara Goodwin, and a rate of \$250 per hour for an associate who was six or seven years out of law school during the relevant period. In 2008, Judge Sam Der-Yeghiayan approved rates of \$450 per hour for partners at the Edelman firm and \$210 per hour for

the same associate. *See Hamm v. Ameriquest Mortg. Co.*, 549 F. Supp. 2d 1018, 1022 (N.D. Ill. 2008).

On September 25, 2013, the Court considered a fee award (a very modest one) in a case brought by the Edelman firm in which it obtained a default judgment. That firm submitted a very comprehensive affidavit by its lead partner, Daniel Edelman, supporting the following hourly rates claimed for each of its partners and associates:

- \$550 for partners Edelman (thirty-seven years of experience), Combs (thirty-seven years), and Lattuner (fifty-one years);
- \$505 for partner Goodwin (twenty-two years);
- \$445 for partners Francis Greene (thirteen years) and Julie Clark (thirteen years);
- \$400 for partner Heather Kolbus (eleven years);
- \$355 for a partner with ten years experience;
- \$230 to \$290 for associates; and
- \$100 to \$125 for paralegals.

See Quazi v. Lizetty and Assoc. Grp. LLC, Case No. 13 C 4512, dkt. no. 19-5 (affid. of Daniel Edelman). This Court's own experience in dealing with fee awards (mostly agreed-upon awards) in consumer cases is generally consistent with a range bracketed on the higher end by the hourly rates proposed for lawyers from the Edelman firm in the *Quazi* case and, at the lower end, with the awards approved by Judges Der-Yeghiayan, Coar, and Gettleman in the cases cited earlier. The latter are, at this point, several years old, indicating that they may not actually represent appropriate current rates. . . .

b. Rates of \$700 for Daniel A. Edelman and \$500 for Francis R. Greene were approved in *Manuel v. Caliber Home Loans, Inc.*, 14-5233-SRC-CLW (D. N.J. on August 20, 2015. The order is attached as Appendix A.

c. Rates of \$550 for Daniel A. Edelman and \$230 for Cassandra P. Miller were approved in *Nadyenova v. Midland Funding, et al.*, 12-cv-632 (N.D.Ill.), on July 11, 2012. The order is attached as Appendix B.

d. Rates of \$550 for Daniel A. Edelman, James O. Lattuner and Cathleen M. Combs, \$400 for former partner, Michelle R. Teggelaar, and \$250 for former associate Jeremy P. Monteiro were requested in the Plaintiff's Final Approval Memorandum and approved in *Bruce v. Wells Fargo Bank*, 2:05cv243 (N.D.Ind.), on October 18, 2007 (Transcript of proceedings, Appendix C).

e. A rate of \$325 for Ms. Hardy was approved by the Honorable Arthur D. Spatt at a fairness hearing in the Eastern District of New York in 2014, *Altigracia Diaz v. Residential Credit Solutions*, 12-cv-03781 (Appendix D).

38. In determining the rates charged by the firm charges and requests, counsel consults surveys of rates charged by other Chicago law firms. Such surveys have been relied

upon by courts in awarding fees. *E.g.*, *FDIC v. Morris*, 1992 U.S. Dist. LEXIS 9439 (N.D.Ill., June 29, 1992); *Alliance to End Repression v. City of Chicago*, 1993 U.S. Dist. LEXIS 1972 (N.D.Ill., Feb. 22, 1993).

39. I am reasonably confident that the rates are accurate, based on my personal knowledge of rates in the legal community, court awards, negotiations with defendants, and discussions with other attorneys.

40. The rates we used are also consistent with fee awards by courts in this or other comparable areas for comparable work:

a. In *Harris N.A. v. Acadia Investments*, 09 C 6661, 2012 WL 1681985 (N.D.Ill., May 14, 2012) (Schenkier, M.J.), a commercial dispute in which the fees paid by plaintiff were shifted to the defendant pursuant to a contractual provision, the court awarded \$775/ hour for a 1984 partner, \$745/ hour for a 1985 partner, \$700/ hour for a 1992 partner, and \$570/ hour for a 1995 partner. Copies of the affidavits establishing these rates are in Appendix E.

b. In *Winston v. O'Brien*, 10 C 8218, 2013 WL 2897161 (N.D.Ill., June 13, 2013) (Bucklo, J.), a police excessive force case, court awarded \$535/ hour for lead counsel, \$450/ hour for a 1994 graduate, \$225/ hour for a second year associate, and \$125 /hour for paralegal work.

c. In *McDonough v. Briatta*, 06 C 2732, 2013 WL 1303800 (N.D.Ill., March 27, 2013) (Pallmeyer, J.), a First Amendment retaliation claim, the court awarded \$500/ hour for 1964 and 1984 partners, \$450/ hour for a 1993 graduate, \$425/ hour for a 1999 graduate, \$400/ hour for a 2001 graduate, \$285/ hour for 2006 and 2007 graduates, and \$100/ hour for paralegal time.

d. In *Scott v. Illinois Youth Center Joliet*, 09 C 1633, 2011 WL 586408 (N.D.Ill., Feb. 9, 2011), an individual employment discrimination case, Magistrate Judge Brown awarded \$100/ hour for paralegal time, \$250/ hour for an associate with 5 years experience, and \$285-\$390/ hour for attorneys with 12-18 years experience, noting that only limited justification had been provided.

e. In *Richardson v. City of Chicago*, 08 C 4824, 2012 WL 6185867 (N.D.Ill., Nov. 20, 2012) (Cole, M.J.), a police misconduct case, the court approved rates of \$425/ hour for an attorney with 17 years experience, \$400/ hour for an attorney with 9 years experience, \$300/ hour for an attorney with 7 years experience, and \$175/ hour for a second year associate.

f. In *Covington v. District of Columbia*, 839 F. Supp. 894 (D.D.C., December 13, 1993), Judge Lamberth found, on the basis of court-approved surveys of rates in the Washington, D.C., area, that it was appropriate to award \$260 per hour to attorneys with between 11 and 19 years experience for the time period 1992-93. He further found that it was appropriate to have an annual increment of \$10 per year or, alternatively, to multiply by 103.4% in accordance with the Consumer Price Index (the result is approximately the same). He also noted that it had been relied upon by six other District Judges in the District of Columbia and the Court of Appeals for the District of Columbia Circuit. Judge Lamberth awarded current rates for all work done in the past, in lieu of making the award at the then-current rate and awarding interest on it.

g. The figures used in the *Covington* case have been updated each year by the office of the U. S. Attorney for the District of Columbia. The updated figures (through 2013) are in the chart attached as Appendix E, available on the Internet site of the U. S Attorney's office ("Laffey Matrix", after *Laffey v. Northwest Airlines, Inc.*, 572 F.Supp. 354 (D.D.C. 1983)).

41. The usual rates which I and the others in my firm charge at the present time are as follows:

- a. Daniel Edelman, Cathleen Combs, and James Lattuner (partners):
\$700 an hour;
- b. Tara Goodwin (partner): \$600 an hour;
- c. Francis R. Greene and Julie Clark (partners): \$500 an hour;
- d. Heather Kolbus (partner): \$500 an hour;
- e. Cassandra P. Miller (partner): \$325 an hour;
- f. Tiffany N. Hardy (partner): \$325 an hour;
- g. Emiliya Gumin Farbstein (associate): \$230 an hour;
- h. Michelle A. Alyea (associate): \$230 an hour;
- i. Sarah M. Barnes (associate): \$230 an hour
- j. Paralegals: \$100-\$125 an hour (based upon experience).

42. All attorneys and legal assistants in my firm are required to and do in fact keep track of their time on a contemporaneous basis, on computer. Everyone enters their time into a computer program, by case number. The computer system automatically sorts the entries by case and generates totals. Expenses are entered into the same computer program as they are incurred. The printouts for this case are attached as Appendix G.

Executed at Chicago, Illinois.

/s/ Daniel A. Edelman
Daniel A. Edelman

EDELMAN, COMBS, LATTURNER & GOODWIN, LLC
20 S. Clark Street, Suite 1500
Chicago, Illinois 60603
(312) 739-4200
(312) 419-0379 (FAX)

APPENDIX A

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

CL

LUTHER B. MANUEL JR. and GERTRUDE
MANUEL, on behalf of themselves and the
class members described herein,

Plaintiffs,

vs.

Case No.: 2:14-cv-05233-SRC-CLW

CALIBER HOME LOANS, INC.; U.S.
BANK TRUST, N.A., as Trustee of LSF8
MASTER PARTICIPATION TRUST;
WELLS FARGO DELAWARE TRUST
COMPANY, N.A., as Trustee for
VERICREST OPPORTUNITY LOAN
TRUST 2013 NPL2 and VERICREST
OPPORTUNITY LOAN TRUST 2014 NPL2;
and DOES 1-25,

Defendants.

~~PROPOSED~~
FINAL APPROVAL ORDER

WHEREFORE, it appearing to the Court that:

A. On May 5, 2015, this Court entered a Preliminary Approval Order which, among other things, preliminarily and conditionally certified this lawsuit to proceed as a class action for settlement purposes only, defined the Settlement Class and Settlement Class Claims, appointed Settlement Class Counsel, preliminarily approved the proposed Stipulation of Settlement which would be binding on the Settlement Class, provided for notice to the Settlement Class including an opportunity for Settlement Class members to request exclusion from the Settlement Class and to object to the proposed Stipulation of Settlement, and scheduled a hearing ("Final Hearing") for August 20, 2015, to consider any objections and to determine whether the proposed settlement is fair, reasonable, and adequate.

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B. In satisfaction of Fed. R. Civ. P. 23(e)(3), a copy of the Stipulation of Settlement was provided to the Court with the Parties' Joint Motion seeking the entry of the Preliminary Approval Order.

C. In accordance with the Court's Preliminary Approval Order, on June 5, 2015, actual notice was sent by first class mail to 15,050 Settlement Class Members by Heffler Claims Group (the "Class Administrator"). A total of 1,331 notices were returned by the United States Postal Service as undeliverable with no forwarding address or further information; 49 notices were returned by the United States Postal Service with a new address and successfully re-mailed; and a total of 3,338 claim forms have been received.

D. In accordance with the Court's Preliminary Approval Order, on June 5, 2015, the Class Administrator established a toll-free telephone number to answer questions from Settlement Class Members through an interactive voice response (IVR) system with an option to leave a message to be responded to by Class Counsel.

E. On August 20, 2015, in accordance with the Preliminary Approval Order [Doc. 32] and Fed. R. Civ. P. 23(e)(2), counsel for the Parties timely appeared for the Final Fairness Hearing to determine whether the action satisfies the applicable prerequisites for class action treatment and whether the proposed settlement is fundamentally fair, reasonable, adequate, and in the best interest of the Class Members and should be approved by the Court;

F. The Class Members were given an opportunity to object to the settlement. Only one Class Member, through counsel, objected to the settlement ("Objector") [Doc. 35]. The Objector's counsel appeared at the Final Hearing and presented the Objector's arguments against the Settlement. The Court having heard and considered the Objections finds them to be without merit and accordingly overrules them for the reasons stated on the record.

G. The Class Members who made valid and timely requests for exclusion are excluded from the class and settlement and are not bound by this Order. Only 31 Class Members requested exclusion. The identities of such persons are set forth in Exhibit A, attached hereto; and

H. With the Court having concluded that the proposed settlement is fair, reasonable, and adequate; and the Court being duly advised in the premises, and for good cause shown;

IT IS HEREBY ORDERED AND ADJUDGED:

1. The Court confirms its certification in the Preliminary Approval Order of this lawsuit as a class action for settlement purposes only and, in accordance with Fed. R. Civ. P. 23(b)(3), defines the "Settlement Class" as:

All persons who were sent the following letters from Caliber on the following dates: (1) A letter with the title "Notice of Sale of Ownership of Mortgage Loan", dated January 9, 2014; (2) A letter with the title "Welcome to Caliber", dated February 12, 2014; and, (3) A letter listing the creditor and principal amount of the loan, dated February 18, 2014.

The Court further defines the "Settlement Class Claims" as those claims of the Settlement Class arising from written communications sent by Caliber, in connection with its servicing of residential mortgage obligations, which allegedly failed to make accurate disclosures as required by 15 U.S.C. §1692(g)(a)(2), 12 U.S.C. §2605, and 15 U.S.C. §1641(g).

2. The Court declares that the Parties' Notice Plan as set forth in the Stipulation, including the notice mailed to Class Members, satisfied the requirements of Fed. R. Civ. P. 23 and constitutional due process.

3. The Court approves the disbursement of the Settlement Fund as provided for in the Stipulation of Settlement and directs that the Class Administrator disburse the payments in accordance with the terms of the Stipulation.

4. The Court approves the award of attorneys' fees and costs to Settlement Class Counsel, in the amount of 288,000, and declares such fees and costs, and the hourly rates sought to be fair and reasonable.

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5. The Stipulation, which was filed with the Court on April 3, 2015 [Doc. 30-2], and which shall be deemed incorporated herein by reference in its entirety, is finally approved and shall be consummated in accordance with the terms and provisions thereof, except as amended by any subsequent order issued by this Court.

6. This Order is binding on all Class Members, except those individuals identified in Exhibit A hereto, who validly and timely excluded themselves from the Settlement Class.

7. The Class Representatives, Class Members, and their successors and assigns are permanently barred and enjoined from instituting or prosecuting, either individually or as a class, or in any other capacity, any of the Released Claims against any of the Released Parties, as set forth in the Stipulation. Pursuant to the release contained in the Stipulation, the Released Claims are compromised, settled, released, discharged, and dismissed with prejudice by virtue of these proceedings and this Order.

8. The Lawsuit is hereby dismissed with prejudice in all respects.

9. This Order is not, and shall not be construed as, an admission by Defendants of any liability or wrongdoing in this or in any other proceeding.

10. The Court retains jurisdiction over the interpretation, enforcement, and implementation of the Stipulation of Settlement and this Final Order. Except as retained, all claims against all Defendants are dismissed with prejudice and without taxing costs.

IT IS SO ORDERED:


HONORABLE STANLEY R. CHESLER
Judge, United States District Court

Dated: 8/20/15

EXHIBIT “A”

<u>First Name</u>	<u>Last Name</u>	<u>Exclusion #</u>
Steven	Catafamo	1
Lazina	King	2
Rebecca	Luker	3
Charles	Wild	4
Trevor	Nightengale	5
Elwood	Gilchrist	6
Rhonda	Evans	7
Melissa	Filippos	8
Paul	Zawadzke	9
Pamela	Carrig	11
Edward	Accomando	12
Latif	Giwa	13
Madison	Rogers	15
Hieu	Nguyen	16
William	Pastino	17
Suzanne	Thompson	19
Edna	Albright	20
Beverly	Marretta	21
Paula	Mexner	22
Fitzroy	Lyte	24
Hugh	Mills	25
Theresa	Jones	26
Richard	Koesler	27
David	Walkerr	28
Kelly	Smith	29
Laura	Wellnitz	30
Charlie	Smith	31
Michael	Szczepaniak	32
Ronald	Carter	33
Rodell	Cotrell	34

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<u>First Name</u>	<u>Last Name</u>	<u>Exclusion #</u>
Anuoluwa	Glwa	14
Heather	Rogers	15
Roberta	Pastino	18
Roberta	McGuane	23
San Juan	Koesler	27

APPENDIX B

Order Form (01/2005) Case: 1:12-cv-00632 Document #: 28 Filed: 07/11/12 Page 1 of 2 PageID #:67

United States District Court, Northern District of Illinois

Name of Assigned Judge or Magistrate Judge	John J. Tharp, Jr.	Sitting Judge If Other than Assigned Judge	
CASE NUMBER	12-c-632	DATE	7/11/2012
CASE TITLE	Naydenova vs. Midland Funding et al.		

DOCKET ENTRY TEXT

Status hearing held. Parties waive briefing on fee petition following presentation of positions in open court and submit issue to Court for resolution. Upon review of Parties' LR 54.3(e) Joint Statement, the Court awards fees and costs to Plaintiff in the amount of \$2,529.98. For further details see text below. This amount stands as the "reasonable attorneys' fees and costs" included in the Court's Judgment [22] entered 4/24/12. Case terminated.

☒ [For further details see text below.]

Docketing to mail notices.

00:06

STATEMENT

This Fair Debt Collection Practices Act case was resolved by Plaintiff's acceptance of Defendants' Offer of Judgment, served on April 19, 2012, pursuant to FRCP 68. The Offer of Judgment was "in the amount of \$1,001 plus reasonable attorneys' fees and costs, as determined by the Court and as allowed by law." This Court entered judgment on the accepted offer and directed the parties to confer regarding the amount of reasonable attorneys' fees and costs to be included in the judgment. On July 9, 2012, the parties reported by means of a Local Rule 54.3(e) Joint Statement, advising that they had been unable to reach agreement on the amount of reasonable attorneys' fees and costs to be included in the judgment. At the status hearing on July 12, the parties waived further briefing on the issue of the amount of attorneys' fees and costs to be awarded, and submitted the issue to the Court for determination. Having reviewed the Joint Statement, including the exhibits supplied by the parties, the Court concludes that attorneys' fees and costs in the amount of \$2,529.98 should be awarded to Plaintiffs under the Offer of Judgment.

The Court finds in general that the fees charged, and effort expended, by Plaintiff's counsel are reasonable, with the exception that the Court concurs with Defendant's objection that it is unnecessary to have five lawyers (four of whom are partners) involved in a case in which the issues were not complex and which was resolved almost immediately. The Court has therefore deducted the time of the three partners who were most tangentially involved in the drafting and review of the complaint (at least as measured by the time they spent on that task). Defendant also objected to the rates charged by these attorneys, but as their time has been excluded, the objection to those rates is moot. By contrast, Defendant's Exhibit B letter to Plaintiff acknowledges that the rates of \$550 per hour for Daniel Edelman and \$230/hour for Cassandra Miller are reasonable and, accordingly, the Court accepts those rates, noting as well that "[c]ourts in this circuit generally have awarded somewhere in the range of \$200 to \$300 per hour for lawyers with significant experience handling these types of cases." See *Brown v. Patelco Credit Union*, 2011 WL 4375865, *3 (N.D.Ill.).

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STATEMENT

While Mr. Edelman's rate is substantially higher, in view of his status as one of the senior partners in the firm and the limited time expended (one hour), the Court does not find the request to recover his fees to be unreasonable, particularly where he is the only partner whose fees will be recovered.

Defendants object to time entries by paralegals that they characterize as "secretarial" in nature. While a few of these tasks are arguably non-legal in nature (e.g., "prep letter and mailing to process server"), the Court finds that most of the paralegal tasks identified in the time entries require specialized knowledge and/or experience that goes beyond generically clerical or secretarial tasks. The filing of specialized forms, such as appearances and civil cover sheets, are examples. In any event, the rate charged by the paralegals performing these task was \$100/hour, and the Court finds that rate reasonable whether the tasks are characterized as "legal" or "clerical" in nature. See, e.g., *Smith v. Astrue*, 2011 WL 2064843, *2 (S.D. Ill.) (reducing attorney hours devoted to similar clerical tasks by 60% where they could have been performed by an experienced secretary or paralegal; the rates charged by paralegals here are approximately 60% lower than the \$230 hour rate charged by the associate attorney assigned to the case).

Defendants object as well to the time entries related to the drafting of a settlement agreement, but the Court finds that effort to have been a reasonable attempt to try to resolve the case (indeed, counsel for the defendants undoubtedly incurred time on the same pursuit). Further, the fact that the Plaintiffs had spent time drafting settlement language was obviously known to the Defendants when the offer of judgment was made; had they wished to exclude time for that purpose, they could have so indicated in their Offer.

The Court does conclude, however, that fees incurred after Plaintiff accepted the Offer of Judgment should be excluded. By its terms, Rule 68 provides only for the recovery of "costs then accrued," that is, the costs incurred up to the point that the Offer of Judgment is made. Once the Rule 68 offer was made, "the clock stopped ticking." *Patelco Credit Union*, 2011 WL 4375865, *6. Attorney's fees are considered "costs" under Rule 68 when the underlying statute provides for attorney's fees to be awarded as part of the costs.

Murek v. Chesney, 473 U.S. 1, 2 (1985) ("[T]he term costs in the Rule was intended to refer to all costs properly awardable under the relevant substantive statute."). Accordingly, there is no basis to assess fees differently in the context of an Offer of Judgment. Defendants' Offer did not extend to cover fees and costs incurred after it was made and Plaintiff's acceptance of that offer renders its request for fees and costs incurred after that date unreasonable.

The Court therefore calculates the fees and costs to be awarded to Plaintiff as follows:

Plaintiff's total fees and costs:	\$4,011.53
Less:	
JOL Time	330.00
MRT Time	160.00
CMC Time	110.00
Time incurred after offer was made (4/19/12)	878.00
Costs incurred after offer was made (4/19/12)	3.55
Revised total fees and costs	\$2,529.98



APPENDIX C

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF INDIANA
3 HAMMOND DIVISION

4 DARRELL BRUCE,

5 PLAINTIFF,

6 VS.

7 WELLS FARGO BANK NA,

8 DEFENDANT.

Cause: 2:05 cv 243

9
10 The FAIRNESS HEARING in the above-entitled matter was
11 commenced before Honorable Philip P. Simon judge of said court, at
12 the Federal Building, 5400 Federal Plaza, Hammond, Indiana, on the
13 18TH day of October, 2007 commencing at the hour of 1:20 in the
14 afternoon.
15
16
17
18
19
20

21 Sharon Boleck Mroz, CSR, RPR, CPE
22 Official Court Reporter
23 US District Court
24 Northern District of Indiana
25 Hammond Division
5400 Federal Plaza
Hammond, IN 46320
(219) 852-6728

Sharon Boleck Mroz, CSR, RPR, CPE
5400 Federal Plaza, Suite 4200
Hammond, IN 46320 (219) 852-6728

Appearances:

Ms. Michelle R. Teggelaar
Edelman Combs Latturner & Goodwin
120 S. LaSalle Street, Suite 1800
Chicago, IL 60603

On behalf of the Plaintiff;

Mr. Robert J. Emanuel PHV
Burke Warren MacKay and Serritella
330 N. Wabash Avenue
Chicago, IL 60611

On behalf of the Defendant.

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Sharon Boleck Mroz, CSR, RFR, CPE
5400 Federal Plaza, Suite 4200
Hammond, IN 46320 (219) 852-6728

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EXHIBITS

(None)

Sharon Boleck Mroz, CSR, RPR, CPE
5400 Federal Plaza, Suite 4200
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1 THE CLERK: All rise.

2 THE COURT: You can be seated. Good afternoon everyone.
3 We're on the record. The cause number is 2:05 CV 243
4 Bruce versus Wells Fargo.

5 Back on the 21st day of June of this year, I
6 preliminarily approved a class action settlement, and I set this
7 date for the fairness hearing.

8 So, if you all can introduce who you are so I know who
9 I'm dealing with here.

10 Sir.

11 MR. EMANUEL: My name is Bob Emanuel. E M A N U E L.
12 And I represent Wells Fargo, and I am very sorry that I was tardy
13 today.

14 I went to the 507 building.

15 THE COURT: Got it.

16 We have been here almost what, five years, Noel?

17 MR. EMANUEL: I've been to this building before. I tried
18 using a navigation system which I'm not really --

19 THE COURT: Don't worry about it.

20 MR. EMANUEL: Obviously.

21 THE COURT: Ma'am. You Miss Teggelaar?

22 MS. TEGGELAAR: Miss Teggelaar, Plaintiff.

23 THE COURT: Nice to see you.

24 All right. Just for the record, it is now 21 minutes
25 after 1:00.

1 This hearing was scheduled to begin at 1:00. There is
2 nobody in the courtroom other than the party -- other than the
3 lawyers and people from the court staff and the court security
4 officer.

5 Evidently, there is no class member who has saw fit to
6 appear to object to the settlement.

7 So, my -- ordinarily my procedure, Miss Teggelaar, is
8 just for you to give a brief summary as to what the terms of the
9 settlement are for the record, and I'll make my findings on the
10 fair and reasonableness of the settlement.

11 So, you may proceed.

12 MS. TEGGELAAR: Pursuant to the settlement, the Plaintiff
13 Darrell Bruce is to receive a thousand dollars which is the maximum
14 provided for by the statute. Each class member that submits a
15 claim form will be entitled to receive a payment of \$200, and the
16 settlement provides for payment of \$75,000 in fees in addition to
17 the class recovery.

18 There were 4,377 notices mailed to the class members.
19 And there were a relatively low number returned, undeliverable,
20 210.

21 There were eight that were returned and remailed, but we
22 received a very, very --

23 THE COURT: That is a very high percentage, isn't it?

24 MS. TEGGELAAR: -- of claim forms back in this case.

25 Actually there is only one other case that we had that anyone at my

1 firm could recall that was rate -- or return this high.

2 There were 1,500 timely. There were 25 late that we had
3 as of October 5. That is about one-third of the class members who
4 decided to return a claim form, which I think shows an overwhelming
5 positive response from the class. We usually see about ten percent
6 returning claim forms.

7 So, the class then -- recovery was about \$300,000. It
8 would be 305,000 if the court elects to allow those late claim
9 forms.

10 We did want to draw to the court's attention that there
11 were some other claim forms that were received that did not appear
12 to be valid. They were all sent by individuals that had the same
13 address as the class member. They probably were family or friends,
14 and individuals did -- that were class members also returned claim
15 forms.

16 So those, after discussing it, we were -- decided we were
17 not going to honor those claims forms. They did not appear to be
18 valid, and we wanted to bring that to the court's attention.

19 There was only one other issue we found out today that
20 the CAFA notice was not provided.

21 THE COURT: I'm sorry. I can't hear you.

22 MS. TEGGELAAR: I'm sorry.

23 The CAFA notice was not provided at the time that was
24 required by statute and Defendant can probably speak. It was
25 apparently a miscommunication with the administrator that was

1 handling it they believed to have done it.

2 And under CAFA, the Court cannot enter that final
3 approval order until after 90 days after the notice has been
4 provided. So, in fact we had discussed what to do in this
5 circumstance, and actually this summer I had a case where that
6 happened, and the defendants didn't provide it on time. And what
7 the Judge did -- that was in Central District of Illinois. The
8 judge held the hearing, didn't enter the final order, made findings
9 that he had approved the settlement. As soon as we -- the time had
10 passed since the notice was provided, that it could be unclear that
11 no state or Federal authorities wished to appear and object to the
12 settlement.

13 THE COURT: When will that be?

14 MR. EMANUEL: It -- and let me address this.

15 And I -- I probably ought to be in the position of
16 thanking Michelle and apologizing to her at the same time.

17 CAFA as you know is a new statute. Many of the cases --
18 I've been doing these cases for 15-some years.

19 And some settlement administrators, the one that I work
20 with, picked up on it right away and sent out the CAFA notice,
21 which is basically a notice to any Federal authority that might
22 have an interest. And I did get correspondence from them saying
23 the quote "notices" had gone out.

24 I -- it's my fault at the end of the day. I did not
25 drill down and find out did they mean the CAFA notice.

1 So, ultimately, what happened is that CAFA notice did not
2 go out. And until it's been out and there have been 90 days, for
3 someone to speak up, my understanding is consistent with
4 Michelle's, no final order can be entered.

5 It does leave the class and Plaintiff's counsel in a
6 position that is not enviable and we have to figure out what we
7 ought do about that.

8 I have -- as the Court noted, never -- I mean, I think
9 this settlement is -- usually defendants don't speak up much in
10 these hearings, but I've never seen a turnout like this.

11 We usually -- Michelle says ten. We usually see seven,
12 eight percent.

13 That said, I'm not worried about anyone having an
14 objection to the settlement.

15 What I'm wondering if is there any way the Court can give
16 final approval to the settlement or approve the settlement and
17 retain jurisdiction to alter that finding if there is an objection,
18 and I don't know if that's -- if that's possible, so that we can
19 go ahead and pay the class members and pay Plaintiff's counsel.

20 THE COURT: Miss Teggehaar. I don't know.

21 MS. TEGGELAAR: Well, that's also come up because
22 recently the Seventh Circuit has said we don't want any orders
23 entered that approve the settlement, retain jurisdiction because
24 that --

25 THE COURT: More than familiar with them.

1 MS. TEGGELAAR: What we have been doing is alternatively
2 to that is having the case dismissed without prejudice, the Court
3 finding that the settlement should be approved but dismissing
4 without prejudice, subject to the settlement being implemented.
5 And then at that time have the order become with prejudice. And I
6 mean, I'm not sure if we can -- technically wouldn't be the final
7 order being entered.

8 THE COURT: When was this CAFA notice sent?

9 MR. EMANUEL: It has not.

10 THE COURT: Has not even occurred.

11 MR. EMANUEL: What happened today is Michelle out of
12 courtesy said to me, "Bob, did you make sure to file the CAFA
13 notice?"

14 And I called the settlement administrator and said --
15 because he sent up a bunch of notices that were filed in this case.

16 And I said, did you send out the CAFA notice. I cannot
17 find it.

18 And he said -- and I don't want to imitate him; he is
19 from the very deep south. He said basically, I don't know what a
20 CAFA notice is.

21 And I say this to be candid with the Court.

22 It did not go out. It will go out today, and then we
23 have a 90 day period. But I think it would be consistent if --

24 THE COURT: What am I supposed to do here then? What if
25 one in a hundred the notice gets out, somebody comes in here and

1 gripes about it and changes my mind. It's not very likely. I
2 can't unring the bell. I can't get money back.

3 I can't -- you know, I mean, in many ways, I'm -- I
4 mean, I think I can make the findings today as it stands right now
5 so we don't even have to have another hearing, that it's a fair and
6 reasonable settlement, that it's -- and make whatever findings I
7 need to make, but take under advisement the possible
8 reconsideration of that should the CAFA notice generate some
9 adverse findings. And unfortunately, you're going to have to wait
10 to get your money, unless you have some other solution here.

11 MS. TEGGELAAR: Well, it's just -- it's the difficulty
12 with the class members. I mean, if it's just a question of
13 waiting, you know, three months to get our fees to have to enter
14 it, that is something we have to deal with, but we already had
15 those individuals calling and asking about that, and --

16 THE COURT: So, what's the solution? What am I missing
17 here? What would be the solution?

18 MS. TEGGELAAR: I really don't have a solution to that.
19 I mean, I -- personally, I think the Defendant should issue the
20 class checks. They want to wait on our fees, do it. It's their
21 risk because it's their mistake. We should have been prepared to
22 go forwarded too. The longer you wait, the less likely those
23 checks get to the class members and be cashed.

24 That is something we see a lot, the longer it takes. And
25 we could say the Defendant then has to try to skip trace them or

1 something if that does happen later.

2 THE COURT: Mr. Emanuel.

3 MR. EMANUEL: Miss Teggelaar makes good points.

4 There is some small, I think very small risk although we
5 do -- first of all, she mentioned some late claims.

6 Once we have come to a settlement, you know, we shall --
7 we generally -- more than generally. I think we have 25
8 late claims. We are going to pay those claims. And in any case,
9 whether you approved it today or whether it was in 90 days. If we
10 send a check out to someone and then it comes back, we track that
11 person down.

12 They don't just leave the checks stale.

13 And here, the amount of money is large enough that people
14 are going to get into contact with us.

15 That's why you have such a high response here. It was a
16 larger settlement per person. I really do -- I apologize to the
17 Court and I apologize to Miss Teggelaar for the issue with the
18 notice. It is embarrassing for me, but I have to be candid and
19 take responsibility for it.

20 And if there is a way that the Court can -- can approve
21 the settlement and retain jurisdiction, once the settlement is
22 approved, we'd be happy to start cutting the necessary checks.

23 THE COURT: I'll approve the settlement today.

24 MR. EMANUEL: Okay.

25 THE COURT: I mean, there is nothing about this

1 settlement that is unreasonable.

2 I was prepared to do that.

3 My concern is maybe not -- I don't quite understand what
4 the effect of the CAFA notice is. Who does it go to, and what is
5 the down side risk here?

6 MR. EMANUEL: It would go to the state Attorney General.
7 It would go to, I believe, a variety of federal agencies.

8 MS. TEGGELAAR: I think they only give it to the US
9 Attorney.

10 MR. EMANUEL: okay, that's it, not the OCC?

11 MS. TEGGELAAR: Since this is just an Indiana class.

12 MR. EMANUEL: Okay. And in my experience, from what I
13 read in the time that Michelle raised this issue -- I suppose I
14 shouldn't say my experience, I might be overstating things.

15 I think the chances of getting an objection here are
16 very, very slim, and I think the chances of getting an objection
17 that could be sustained are even slimmer.

18 THE COURT: All right.

19 Here's what I'm going to do. I'm going to issue -- I'm
20 going to approve the settlement.

21 MR. EMANUEL: okay.

22 THE COURT: And I'm going to order you to pay the class
23 members and counsel immediately, or --

24 MR. EMANUEL: Pursuant to --

25 THE COURT: Pursuant to the agreement, a few weeks.

1 MS. TEGGELAAR: Right.

2 THE COURT: And I will simply dismiss the case without
3 prejudice, pending -- even though I probably can't do that, but I
4 will, because this is -- you know, this is -- the risk is so low
5 here.

6 MR. EMANUEL: Uh-huh.

7 THE COURT: And we'll just keep it -- I'll wait to hear
8 back from you all --

9 MR. EMANUEL: Okay.

10 THE COURT: -- in 90 days, in which case you can file
11 something that will tell me that you can dismiss it with prejudice,
12 because nobody has objected to it.

13 MR. EMANUEL: And specifically, what I would propose is
14 that perhaps we even set a -- I don't know if you can set a status
15 date that in 91 days, we will provide the Court with proof that the
16 CAFA notice went out, and that there has been no objection or
17 response, if that's what the Court wants.

18 THE COURT: That's fine.

19 I don't think we have to have a hearing. In my world on
20 the 91st day you'll just file something that will tickle us that
21 will say, oh, by the way we sent out the notice, we got no
22 response, the dismissal can be converted from without prejudice to
23 with prejudice and the case is over.

24 MR. EMANUEL: Okay.

25 MS. TEGGELAAR: There is one other little glitch.

1 THE COURT: Sure.

2 MS. TEGGELAAR: That's because of the Seventh Circuit,
3 not because of the CAFA notice, because we need to make sure
4 everything is done in the settlement before it's final because the
5 court can't dismiss, retain jurisdiction, we need to make sure that
6 we can do that up and through the time when they would have to give
7 the cy pres award.

8 So when I originally calculated that out before I was
9 aware of this issue, triggered by the approval today and then when
10 the payment would come due and checks would be issued to class
11 members, the settlement agreement provides that their checks are
12 good for 90 days. And after the checks are void, then the
13 defendant has to give out cash funds to the cy pres.

14 I think I calculated that out to be about six months
15 total into April. And I think in the draft order I submitted I
16 just left a blank that this order will become final on X date
17 unless--

18 MR. EMANUEL: Can I -- because if the case can't be
19 dismissed with prejudice for six months anyways --

20 MS. TEGGELAAR: Then this will be done well before that.

21 MR. EMANUEL: Yes.

22 THE COURT: okay.

23 MS. TEGGELAAR: I mean, I could --

24 MR. EMANUEL: Or the --

25 THE COURT: One at a time.

1 MS. TEGGELAAR: I'm sorry.

2 I can add a paragraph actually in what I submitted that
3 has a separate requirement that verification after the 90 days
4 passed, defendant will file something that -- saying that no
5 objection has been made, and leave the paragraph in here as it is
6 about being converted to dismissal with prejudice, and we can pick
7 a date in April some time.

8 THE COURT: That's fine. Why don't you go ahead and do
9 that by a week from today.

10 MS. TEGGELAAR: I mean, I can probably as soon as I get
11 back to my office, I can make that change --

12 THE COURT: Fair enough. Okay.

13 MS. TEGGELAAR: -- and send it over.

14 THE COURT: And you wanted to appear here telephonically?

15 MR. EMANUEL: Today I asked if I could. We had done it
16 in the past in this case frequently.

17 I want to make clear that my request to appear
18 telephonically was made before I got Michelle's e-mail.

19 THE COURT: Fair enough.

20 MR. EMANUEL: Then when I talked to Michelle because I
21 told Michelle I was hoping -- she said, are you going to appear
22 telephonically. I said, not now. So --

23 THE COURT: All right.

24 MR. EMANUEL: Usually at a -- at a final approval
25 hearing, I did it in front of Judge Zagle. Usually I say nothing

1 other than we think the settlement is fair.

2 THE COURT: I'm relatively new at this. I've probably
3 done five of these, but you know, you never know when somebody is
4 going to walk in the door and say, I don't like what I'm seeing
5 here.

6 MR. EMANUEL: Well, I would appear telephonically and our
7 local counsel is going to come and sit where I'm sitting. Once the
8 CAFA issue came up, I thought it was important for me to be here
9 and explain.

10 THE COURT: You thought it was important go to 507 State
11 street.

12 MR. EMANUEL: It's been a -- not been my best day.

13 THE COURT: All right.

14 Here are the factors I have to consider in deciding
15 whether to grant final approval of a class action settlement: The
16 strength of the Plaintiff's case on the merits as measured against
17 the terms of the settlement; the complexity, length and expense of
18 the continued litigation; the amount of opposition to the
19 settlement among class members; the presence of any collusion in
20 gaining a settlement; the stage that the proceedings are in; and
21 the amount of discovery that's been completed. In taking -- in
22 consideration all those factors, this is a very favorable
23 settlement to the Plaintiff class as I see it, although I -- I
24 felt that it was a fairly strong case for the plaintiff. Although
25 I know that there's been no admission of liability here, I had

1 concern with this -- with this particular solicitation. So, it
2 -- it was a strong case and that's perhaps what led to a favorable
3 settlement in my judgment for the Plaintiff's class.

4 The law firm that is representing the Plaintiff's class
5 has appeared in this Court and across the Midwest and I assume
6 around the country litigating consumer class action litigation, and
7 as always, done excellent work in my court. And this was a complex
8 piece of litigation.

9 The fact that we have no one here in court opposing the
10 settlement, and more importantly the fact that there's been really
11 a very amazing response from the class participating in the
12 settlement, approximately a third of the prospective class or of
13 the class have returned the forms to -- asking to participate
14 really indicates the overwhelming approval that the class members
15 have in the settlement that's been negotiated by the Plaintiff's
16 counsel.

17 There's no evidence at all of any -- of any inclusion,
18 and -- and on the issue of attorney's fees, I think they are more
19 than reasonable on a case in which approximately \$300,000 is going
20 to be paid to the class. I guess what would amount to
21 approximately 25 percent of that amount in addition to that as
22 attorney's fees does not strike me at all as unreasonable and the
23 rates that were requested in the loadstar method that are set out
24 in the petition to approve the settlement, I find to be totally
25 reasonable given the prevailing market rates for this type of

1 litigation.

2 I will also approve the late filers, the people who filed
3 the claim forms late. I believe there is 25 of them. I would
4 include them as part of the final judgment here. And that they too
5 can participate in the settlement.

6 Okay. Anything else I need to do then?

7 MS. TEGGELAAR: I don't think so.

8 THE COURT: No?

9 MR. EMANUEL: No, your Honor.

10 THE COURT: So then I want to make sure I'm clear. Miss
11 Teggelaar, you'll file something today or tomorrow that is going to
12 update the proposed form of order adding the information that we
13 talked about?

14 MS. TEGGELAAR: Yes.

15 THE COURT: And I'll enter that immediately, you're
16 saying or do I want until the 90 days?

17 MS. TEGGELAAR: That -- the order that I would be
18 submitting, you could enter immediately.

19 THE COURT: And then in 90 days you'll be filing
20 something else that I can convert what I'm entering tomorrow or the
21 next day into a final dismissal with prejudice?

22 MS. TEGGELAAR: The order that I will submit will have a
23 provision in it stating that it will become final with prejudice
24 after a certain date, and I can count out six months from --

25 THE COURT: I got it.

1 MS. TEGGELAAR: -- today.

2 THE COURT: I'm following you now.

3 MS. TEGGELAAR: We won't have to go and enter another --

4 THE COURT: I was a little murky on that. Got it.

5 okay. Thank you very much. Thank you, sir.

6 MR. EMANUEL: And again I apologize. I do have a couple
7 of comments once we left the record.

8 THE COURT: Yeah. Okay. We can go off the record.

9 (WHICH WERE ALL THE PROCEEDINGS HAD).

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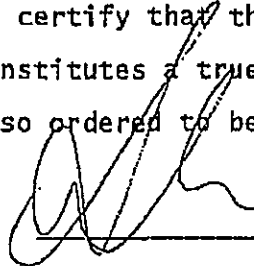
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C E R T I F I C A T E

I, Sharon Boleck Mroz, being a duly authorized and acting official court reporter for the United States District Court, for the Northern District of Indiana, Hammond Division, do hereby certify that I did report in machine shorthand the foregoing proceedings, and that my shorthand notes so taken at said time and place were reduced to typewriting under my personal direction.

I further certify that the foregoing typewritten transcript constitutes a true record of said proceedings, so ordered to be transcribed.



Sharon Boleck Mroz
Official Court Reporter

APPENDIX D

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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ALTAGRACIA DIAZ, on behalf of :
herself and all others :
similarly situated, :

12 CV 3781

Plaintiff, :

-against- :

U.S. Courthouse
Central Islip, N.Y.

RESIDENTIAL CREDIT SOLUTIONS, :
INC., :

Defendant. :

September 29, 2014

- - - - - X

9:30 a.m.

TRANSCRIPT OF FAIRNESS HEARING

BEFORE:

HONORABLE ARTHUR D. SPATT, U.S.D.J.

APPEARANCES:

For the Plaintiff: LAW OFFICES OF KLEINMAN, LLC
626 REXCORP PLAZA
UNIONDALE, NEW YORK 11556
BY: ABRAHAM KLEINMAN, ESQ.

For the Defendant: LOWENSTEIN SANDLER, LLP
1251 AVENUE OF THE AMERICAS
NEW YORK, NEW YORK
BY: JASON HALPER, ESQ.

Court Reporter: HARRY RAPAPORT, CSR
United States District Court
100 Federal Plaza
Central Islip, New York 11722
(631) 712-6105

Proceedings recorded by mechanical stenography.
Transcript produced by computer-assisted transcription.

1 THE CLERK: Civil cause for fairness hearing,
2 Diaz against Residential Credit Solutions, Inc.

3 THE COURT: Please state your appearances.

4 MR. KLEINMAN: Good morning, your Honor.

5 Law offices of Kleinman LLC, by Abraham
6 Kleinman, for the plaintiff and the class.

7 THE COURT: Good morning.

8 MR. HALPER: Good morning, your Honor.

9 Jason Halper of Loweinstein Sandler LLP, for the
10 defendant.

11 THE COURT: I didn't get your name, what is it.

12 MR. HALPER: Jason Halper, H-A-L-P-E-R:

13 THE COURT: Mr. Kleinman, you are interested in
14 me approving this settlement, right?

15 MR. KLEINMAN: We are, your Honor.

16 THE COURT: Why?

17 MR. KLEINMAN: Your Honor, this is a case that
18 involved a Fair Debt Collections Practices Act, where the
19 plaintiff complained a violative collection letter.

20 With the assistance of your Honor we reached a
21 settlement several months ago, and subsequent to that
22 notice was sent out.

23 Notice was sent, your Honor, to 378 persons.
24 Only 350 of those were effective and reached their
25 destination.

1 Of those 350 notices that reached their
2 destination, ninety-one persons opted into the class.
3 Eighty-eight of those were timely, your Honor. Three were
4 a bit late. And at this juncture, if your Honor approves
5 the class, we would ask that the Court allows those three
6 that were late to be included in the class.

7 Should your Honor approve the class and approve
8 all 91 claim forms each member would receive \$1,098.90.

9 THE COURT: \$1,098 and 98 cents?

10 MR. KLEINMAN: 90 cents.

11 Plaintiff believes it is a terrific result for
12 the class because in an ordinary situation the maximum
13 amount a consumer could receive under the Act would be
14 \$1,000.

15 Here each class member, should the Court
16 approve, would be getting in excess of the statutory
17 amount listed in the Fair Debt Collections Practices Act.

18 Also at this time, your Honor, we would ask the
19 class representative receive an incentive fee totalling
20 \$5,000 for her participation in the class.

21 THE COURT: That is Ms. Diaz. A male or female?

22 MR. KLEINMAN: A female, at Altagracia Diaz.

23 THE COURT: She is going to get 5,000?

24 MR. KLEINMAN: Should the Court approve.

25 The reason we ask for the incentive fee is

1 Ms. Diaz was very involved in the class, and followed the
2 travel of the case, appeared for deposition, appeared for
3 a conference before Magistrate Judge Tomlinson, and has
4 been very effective and has followed the case in toto.

5 We would also ask, your Honor, that the Court
6 approve the attorney's fees in the amount of \$98,330.

7 THE COURT: That would be in addition to the
8 100,000?

9 MR. KLEINMAN: It would, your Honor.

10 THE COURT: And what is the hourly rate for
11 that?

12 MR. KLEINMAN: My hourly rate was at \$300, and
13 Ms. Hardy in Illinois, if I can have a moment to double
14 check, I believe that was at \$325 per hour for Ms. Hardy
15 of the Edelman Combs firm in Illinois.

16 THE COURT: And what about payments to the
17 paralegal? What rate is being paid?

18 MR. KLEINMAN: They pay their paralegal between
19 100 and \$125 per hour, your Honor.

20 THE COURT: Mr. Halper.

21 MR. HALPER: Good morning, your Honor.

22 We have no objection to the settlement.

23 The only thing that I would point out to your
24 Honor is that in the proposed final order for approval of
25 the class settlement that the plaintiff filed on September

1 24th, in paragraph one it does mention that there were 88⁵
2 class members who submitted a timely claim firm.

3 So, if we are going to approve --

4 THE COURT: Which form are we talking about?

5 MR. HALPER: I'm sorry, your Honor.

6 The proposed final order, document 62-4 on the
7 documents, which was filed by the plaintiff on September
8 24th.

9 MR. KLEINMAN: If the Court would like, your
10 Honor, I can present a copy.

11 THE COURT: I don't see it. Can I see a copy?

12 MR. KLEINMAN: Can I approach?

13 THE COURT: Yes.

14 MR. KLEINMAN: Thank you.

15 (Handed to the Court.)

16 THE COURT: Just one minute.

17 I do have a copy. It is Exhibit C, for Charley,
18 right?

19 MR. KLEINMAN: Yes, your Honor.

20 THE COURT: Okay.

21 You can return this.

22 MR. KLEINMAN: May I approach?

23 THE COURT: Yes.

24 So, you mentioned that the final order says 88
25 class members, when there actually are going to be 91 if I

6

1 approve the three late filings?

2 MR. HALPER: Yes.

3 THE COURT: I will approve the three late
4 filings, so it will be 91.

5 MR. HALPER: Yes, your Honor.

6 We have no objection to that.

7 The only other thing I will mention, your Honor,
8 in paragraphs 6 and 17 of the proposed final order, it
9 states that the claims that are being released in this
10 case are being dismissed without prejudice. We would just
11 ask the claims be dismissed with prejudice.

12 I have conferred with Mr. Kleinman about that,
13 and if you look at paragraph 21 --

14 THE COURT: Any objection to the dismissal with
15 prejudice, Mr. Kleinman?

16 MR. KLEINMAN: Your Honor, we would be happy to
17 dismiss it with prejudice after a period where an appeal
18 might be filed.

19 THE COURT: Okay.

20 MR. HALPER: And that is fine with me.

21 If we were to do that, I would ask that
22 paragraphs 6 and 17 be clarified.

23 THE COURT: You will have to amend that.

24 MR. HALPER: Yes.

25 THE COURT: Anything else?

1 MR. HALPER: Not from the defendant, your Honor. ⁷

2 MR. KLEINMAN: If I may, your Honor? I would
3 just like the Court to note that there have been no
4 objections or exclusions, and no one has appeared today.

5 However, I was informed that a Ms. Francine
6 Moore, who was a claim member, whose claim was title, who
7 the Court has since approved, was planning in attending
8 today. And I do not see her in the Court.

9 I have a conference before Judge Feuerstein at
10 11:00 o'clock this morning, and if the Court allows I will
11 stay to address the concerns.

12 THE COURT: What concerns does she have?

13 MR. KLEINMAN: She just wanted to see the
14 proceedings, but nonetheless, if I can stay I will address
15 any concerns she may have.

16 THE COURT: Anything else, counsel?

17 MR. KLEINMAN: No, your Honor.

18 THE COURT: This is one of the easiest class
19 actions fairness hearings, I have ever been in. As a
20 matter of fact, it is probably the only one in which
21 there is no objection. And the attorney's fees are fair.
22 That combination we rarely see.

23 We have a situation where under the statute the
24 damages would be a thousand dollars a person generally
25 with some exceptions, to the Fair Debt Collections

1 Practices Act violation. And here the claimants are going⁸
2 to receive \$1,098.90. So they are a little bit ahead of
3 the game.

4 I think that, therefore, the \$100,000 to be
5 distributed to the 91 class members is fair. Each class
6 member, as I said would get \$1,098.90, which is a little
7 more than they would receive under the statute.

8 The \$5,000 to the class representative is also
9 in my opinion fair. She is the one who put the work in.

10 Also, the attorney's fees of \$94,330 at rates of
11 300 and 325 dollars an hour is also fair.

12 The paralegal of 100 to 125, that is okay as
13 well.

14 So that, surprisingly, everything in this
15 agreement is fair. And I'm going to approve it in its
16 entirety.

17 So, I want you to send me a final approval order
18 with the revisions that counsel for the defendant has
19 raised. And that is paragraph 17 has to be revised.

20 What is the other revision?

21 MR. HALPER: It was also paragraph six, your
22 Honor, it was to be without prejudice.

23 THE COURT: Yes.

24 MR. HALPER: And I believe --

25 THE COURT: It is going to be with prejudice.

1 MR. HALPER: And paragraph 1 references there
2 were 88 participating --

3 THE COURT: It has to be 91?

4 MR. HALPER: Yes.

5 THE COURT: So you will have to make those
6 changes.

7 Send that to me with notice and I will sign it.

8 MR. KLEINMAN: Thank you, your Honor.

9 THE COURT: Okay.

10 This has been a very easy fairness hearing.

11 Thank you very much.

12 MR. KLEINMAN: Thank you, your Honor.

13 Just for completeness of the record, those
14 members who do not cash their checks, those monies will go
15 to the Legal Aid Society, your Honor.

16 THE COURT: Thank you.

17 This fairness hearing is concluded.

18 MR. HALPER: Thank you, Judge.

19

20

21 (End of proceedings.)

22

23

24

25

APPENDIX E

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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

HARRIS N.A.,)	
)	
Plaintiff,)	
)	
v.)	No. 1:09-cv-06661
)	
ACADIA INVESTMENTS L.C., and LOREN W.)	Hon. Sidney J. Schenkier
HERSHEY,)	
)	
Defendants.)	

DECLARATION OF DAVID T.B. AUDLEY

I, David T.B. Audley, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury that the following is true and correct.

1. The undersigned is an attorney for BMO Harris Bank N.A. ("Harris") in this case and is authorized to make this Declaration on behalf of Harris in support of Plaintiff's Motion for Attorneys' Fees and Costs Pursuant to Fed.R.Civ.P. 54(D) and Local Rule 54.3 (the "Motion"). This Declaration is made based upon my personal knowledge of the facts contained herein.

2. I received my law degree from the University of Wisconsin in 1985. I am attorney licensed to practice in the State of Illinois. I am admitted to practice in the United States District Courts for the Northern District of Illinois, Southern District of Indiana, Eastern District of Wisconsin, Western District of Wisconsin and Massachusetts. I am also admitted to practice in the United States Courts of Appeals for the Seventh Circuit and Sixth Circuit.

3. I am a partner in the firm of Chapman and Cutler LLP. I have had primary responsibility for the services rendered in this case on behalf of Harris.

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4. My current hourly rate is \$745.00. My hourly rates in 2009, 2010 and 2011 were \$560, \$595 and \$650, respectively. The hourly rates for the other attorneys and paralegals at Chapman and Cutler LLP who worked on this case are reflected in the table below.

Attorney/Paralegal	2009 Rate	2010 Rate	2011 Rate	2012 Rate
Terry McIroy	610.00	650.00	710.00	775.00
Leo Gagon	N/A	650.00	710.00	775.00
Michael Benz	560.00	595.00	650.00	715.00
Steve Hastings	560.00	595.00	650.00	715.00
Dan Baker	495.00	520.00	570.00	655.00
Jim Sullivan	470.00	500.00	530.00	575.00
Laura Appleby	285.00	335.00	390.00	455.00
David Standa	245.00	245.00	315.00	390.00
Kaitlin Corkran	245.00	290.00	365.00	
John Glazzon	200.00	210.00	225.00	235.00

5. These are the actual rates which Chapman and Cutler LLP charges and has charged paying clients (including Harris) in other cases for the types of services rendered in this case. These hourly rates fall within, and do not exceed, the prevailing market hourly rates in Chicago (and in the case of Leo Gagon and Kaitlin Corkran, in New York, as reflected by Mr. Gagon's Declaration also submitted with this Motion) for similar services by lawyers and paralegals of reasonably comparable skill, experience and reputation.

6. For services and disbursements incurred in connection with the representation of Harris in this case, Harris has paid or become obligated to pay attorneys' fees and costs to

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Chapman and Cutler LLP in the total amount of \$613,777.25, comprised of \$19,747.00 in fees and \$14.88 in costs as reflected on the detailed billing records and time entries attached as Exhibits 9, 10 and 11 to the Motion, \$499,192.00 in fees and \$72,047.83 in costs as reflected on the detailed billing records and time entries attached as Exhibits 12, 13 and 14 to the Motion, and \$22,299.50 in fees and \$476.04 in costs for Harris' local Virginia counsel as reflected on the detailed billing records and time entries as attached as Exhibits 15, 16 and 17 to the Motion.

7. The amount of fees requested in the Motion, and the hours expended by Chapman and Cutler LLP in its representation of Harris in this case, are reasonable. The referenced Exhibits to the Motion relate to discrete categories of fees and costs incurred by Harris as a result of Acadia's default under the Credit Agreement, and thereafter the enforcement of Harris' rights under the Credit Agreement, \$15.5 Million Note and Hershey's \$15.5 Million Guaranty, including post-default/pre-litigation efforts to resolve matters and thereafter the litigation itself, as well as post-judgment collection activities occurring in Chicago, Illinois, Fairfax County, Virginia, and New York City.

8. Specifically, the Chapman fees and costs identified at paragraph 11 of the Motion as "Matter No. 1679539," totaling \$19,747.00 in fees, and \$14.88 in costs, were incurred as a result of default under the Credit Agreement starting in February 2009, which resulted in, *inter alia*, the negotiation, drafting and execution of the Forbearance and Second Amendment between Harris, Acadia and Hershey, and before any litigation ensued in the Fall of 2009. The separate Chapman fees and costs identified at paragraph 11 of the Motion as "Matter No. 1966589", totaling \$499,192.00 in fees, and \$72,047.83 in costs, were incurred by Harris from August 2009 through February 1, 2012, and relate to activity after default occurred under the Forbearance and Second Amendment, which necessitated the issuance of a formal demand for payment and the subsequent litigation phase of the matter, including all post-judgment collection efforts. Those

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post-judgment collection efforts, alone, include: (i) the utilization of a partner in Chapman's New York City Office, Leo Gagon, relating to domestication of the Judgment and enforcement efforts seeking to obtain over \$1.5 million in distributions otherwise payable to Hershey, currently being held by a private equity fund, DLJ Private Equity Partners Fund II, L.P. (the "*DLJ Fund*"), which has now been the subject of objections filed by Hershey and his New York lawyers, as well as (ii) the utilization of a Virginia firm, McGuireWoods, to domesticate the Judgment in Fairfax County, Virginia (where Hershey resides), and thereafter to conduct post-judgment citation examinations of Hershey and other collection efforts.

9. Detailed reports of the fees and costs incurred (redacted as necessary to protect attorney client privilege) are attached hereto as Exhibits 9 through 17, as referenced in the tables above. These reports provide the name of the attorney or paralegal providing the services, a description of the services provided, the date(s) the services were provided, the amount of time expended for such services, and the charge for such services based upon the normal and customary hourly rate charged by each service provider. Costs are also broken down in these reports by the date incurred, line item description, and the amount(s) charged for each expense.

10. As to my direct participation in this credit and the litigation itself, in the Fall of 2009 default occurred under the Forbearance and Second Amendment, which was not cured by Acadia, necessitating pre-filing loan document reviews, meetings with Harris, and the preparation and issuance of default and demand notices, all as reflected in the detailed billing and time entries attached as Exhibit 12.

11. After multiple fruitless negotiations with Hershey were attempted to reach a non-litigation resolution, the lawsuit was prepared and filed in October, 2009, and thereafter prosecuted through summary judgment, which was opposed by Acadia and Hershey throughout, on multiple grounds.

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12. Discovery was initiated by Acadia and Hershey, including document production and the depositions of multiple Harris employees. In addition, during the litigation, Harris sought to enforce its rights under the loan documents in seeking to obtain payment from the various private equity funds in which Acadia held an interest, and which had been pledged to Harris as collateral. These private equity funds, in turn, initiated extensive communications with Harris as to Acadia's capital call defaults thereunder, with multiple and lengthy discussions occurring with these private equity funds to try and accomplish a sale of these funds, which necessitated Acadia and Hershey's consent, but which was never obtained.

13. Continual subsequent attempts at settlement were also made by Harris to try and avoid further litigation costs. Settlement, however, could not be reached, requiring the preparation and filing of the summary judgment motion, statements and counter statements of material fact, and legal memoranda submitted by all of the parties. After summary judgment was granted, Hershey would not initially agree to resolve matters, including a relatively small interest rate issue that required extensive negotiations with counsel to Acadia and Hershey, ultimately resulting in a resolution of the issue per stipulation (but which Hershey subsequently, but unsuccessfully, attempted to withdraw from).

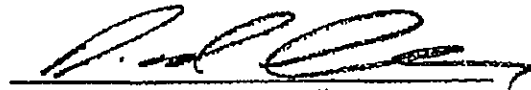
14. After the Judgment was entered, post-judgment collection activities were then initiated in this Court via the issuance of multiple third party citations, as well as the registration of the Judgment in Fairfax County, Virginia, and New York state court located in New York City. The Declarations of Leo Gagon of Chapman's New York office (Exhibit 3 the Motion), and Doug Foley of McGuireWoods' Norfolk, Virginia office (Exhibit 4 the Motion), describe these post-judgment activities.

15. In addition, Chapman has represented Harris in Hershey's efforts before this Court to enjoin or stay enforcement of the Judgment, Hershey's subsequent motion to quash third party

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citations issued by the clerk of this Court, as well as Hershey's appellate efforts in the Seventh Circuit, including settlement conferences before the Seventh Circuit settlement panel. Chapman has also represented Harris against Hershey's more recent attempts to utilize the Acadia bankruptcy to enjoin further collection efforts by Harris.

16. All of these efforts are as set forth in the detailed billing and time entries attached to the Motion as Exhibits 12, 13 and 14.

A handwritten signature in black ink, appearing to read 'D. Audley', is written over a horizontal line.

David T.B. Audley

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EXHIBIT 2

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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

HARRIS N.A.,)	
)	
Plaintiff,)	
)	
v.)	No. 1:09-cv-06661
)	
ACADIA INVESTMENTS L.C., and LOREN W.)	Hon. Sidney I. Schenkier
HERSHEY,)	
)	
Defendants.)	

DECLARATION OF DANIEL W. BAKER

1, Daniel W. Baker, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury that the following is true and correct.

1. The undersigned is an attorney for BMO Harris Bank N.A. ("*Harris*") in this case and is authorized to make this Declaration on behalf of Harris in support of Plaintiff's Motion for Attorneys' Fees and Costs Pursuant to Fed.R.Civ.P. 54(D) and Local Rule 54.3 (the "*Motion*"). This Declaration is made based upon my personal knowledge of the facts contained herein.

2. I received my law degree from the University of Chicago in 1995. I am an attorney licensed to practice in the State of Illinois.

3. I am a partner in the firm of Chapman and Cutler LLP. I had primary responsibility for the services rendered in this case on behalf of Harris prior to the matter being transferred to our litigation department, where David Audley, a partner in our litigation group, assumed primary responsibility.

4. My hourly rates in 2009, 2010 and 2011 were \$495, \$520 and \$570, respectively.

5. These are the actual rates which Chapman and Cutler LLP charges and has charged paying clients (including Harris) in other cases for the types of services I rendered to Harris in

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this matter. These hourly rates fall within, and do not exceed, the prevailing market hourly rates in Chicago, Illinois for similar services by lawyers and paralegals of reasonably comparable skill, experience and reputation.

6. For services and disbursements incurred in connection with my representation of Harris in this case, Harris has paid or become obligated to pay attorneys' fees and costs to Chapman and Cutler LLP in the total amount of \$19,761.85. This figure is comprised of \$19,747.00 in fees and \$14.88 in costs and expenses.

7. Detailed reports of these fees and expenses incurred to date are attached to the Motion as Exhibits 9, 10 and 11.

8. The amount of fees requested in the Motion, and the hours expended by myself and others under my supervision at Chapman and Cutler LLP in its representation of Harris in this matter, are reasonable. I was the principal attorney representing Harris in the preparation of the notice of acceleration, as well as the negotiation, preparation and execution of the Forbearance Agreement and Second Amendment to Credit Agreement ("*Forbearance and Second Amendment*"), after default occurred under the Credit Agreement, as well as other matters incident to the credit, including conferences with Harris and the review of letters to private equity funds, all of which are described in the time entries attached to the Motion as Exhibits 9, 10 and 11.


Daniel W. Baker

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EXHIBIT 3

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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

HARRIS N.A.,)	
)	
Plaintiff,)	
)	
v.)	No. 1:09-cv-06661
)	
ACADIA INVESTMENTS L.C., and LOREN W.)	Hon. Sidney I. Schenkier
HERSHEY,)	
)	
Defendants.)	

DECLARATION OF LEO V. GAGION

I, Leo V. Gagon, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury that the following is true and correct.

1. The undersigned is an attorney for BMO Harris Bank N.A. ("Harris") in this case and is authorized to make this Declaration on behalf of Harris in support of Plaintiff's Motion for Attorneys' Fees and Costs Pursuant to Fed.R.Civ.P. 54(D) and Local Rule 54.3 (the "Motion"). This Declaration is made based upon my personal knowledge of the facts contained herein.

2. I received my law degree from the Fordham University School of Law in 1984. I am an attorney licensed to practice in the State of New York. I am admitted to practice in the United States District Courts for the Eastern District of New York, Southern District of New York and Northern District of New York. I am also admitted to practice in the United States Courts of Appeals for the Federal Circuit, Second Circuit and Tenth Circuit.

3. I am a partner in the General Litigation Department of Chapman and Cutler LLP, headquartered in Chapman's New York City office. I have had primary responsibility for the post-judgment collection legal services rendered in this case on behalf of Harris in New York State Supreme Court, New York County.

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4. My current hourly rate is \$775.00. My hourly rate in 2011 was \$710.00.

5. These are the actual rates which Chapman and Cutler LLP charges and has charged paying clients (including Harris) in other cases for the types of services rendered in this case. These hourly rates fall within, and do not exceed, the prevailing market hourly rates in New York City for similar services by lawyers and paralegals of reasonably comparable skill, experience and reputation.

6. For the 168 total hours for legal services and disbursements incurred from September 9, 2011 to February 1, 2012 in connection with my representation of Harris in this case to prosecute post-judgment collection activities in New York state court, Harris has paid or become obligated to pay attorneys' fees and costs to Chapman and Cutler LLP in the total amount of \$123,245.00.

7. Detailed reports of these fees and expenses incurred to date for my representation of Harris in this matter are attached to the Motion as part of Exhibits 12 (one entry on September 7, 2011) and Exhibits 13 and 14.

8. The amount of fees requested in the Motion, and the hours expended by myself on behalf of Harris in this matter, are reasonable. From September 9, 2011 to February 1, 2012, I have devoted my time and attention to a number of different matters in connection with enforcing the Judgment obtained in this Court. Specifically, I devoted time and attention to the registration of the Judgment in this case with the New York State Supreme Court in New York County under Article 54 of the NY CPLR. My work included researching the process for such registration both in New York federal and state court, and the preparation of the judgment documents for filing with the New York State Supreme Court, including the preparation of a substantive affidavit supporting the filing of the Judgment. In addition, I devoted substantial time to commencing and prosecuting the matter of *BMO Harris Bank N.A. v. DLJ Private Equity*

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Partners Fund II, Index No. 112067/2011 (N.Y. State Supreme, N.Y. Co.), a turnover action, pursuant to NY CPLR 5225(b) & 5227, that Harris commenced in October 2011, for the purpose of securing approximately \$1.5 million in distributions that the DLJ Private Equity Fund owes to Loren W. Hershey, the Judgment Debtor in this matter, but had not yet paid to him. My work on this matter was extensive and included researching and drafting the Verified Petition, negotiating with the DLJ Private Equity Fund over the terms of the turnover, preparation of a proposed judgment for the turnover proceeding, and defense of an extensive motion of the Judgment Debtor, brought by Order to Show Cause, to intervene and vacate the New York Court's Order granting the Verified Petition. The defense of the Judgment Debtor's Motion consisted of substantial briefing of the issues to the Court (including an extensive Memorandum of Law and two substantive Affidavits) and preparation for and attending the hearing on the motion held on January 25, 2012.



Leo V. Gagon

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EXHIBIT 4

Document2

Case: 1:09-cv-06661 Document #: 163-2 Filed: 03/02/12 Page 2 of 19 PageID #:1052

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

BMO HARRIS N.A.,)	
)	
Plaintiff,)	
)	
v.)	No. 1:09-cv-06661
)	
ACADIA INVESTMENTS L.C., and LOREN W.)	Hon. Sidney I. Schenkier
HERSHEY,)	
)	
Defendants.)	

DECLARATION OF DOUGLAS M. FOLEY

I, Douglas M. Foley, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury that the following is true and correct.

1. The undersigned is an attorney for BMO Harris Bank N.A. ("Harris") in this case and is authorized to make this Declaration on behalf of Harris in support of Plaintiff's Motion for Attorneys' Fees and Costs Pursuant to Fed.R.Civ.P. 54(D) and Local Rule 54.3 (the "*Motion*"). This Declaration is made based upon my personal knowledge of the facts contained herein.

2. I received my law degree from the George Mason University School of Law in 1992. I am an attorney licensed to practice in the Commonwealth of Virginia in all state and federal courts. I am admitted to practice in the State of North Carolina, the State of New York and the District of Columbia. I am also admitted to practice in the United States Courts of Appeals for the Fourth Circuit.

3. I am a partner in the firm of McGuireWoods LLP. I have had primary responsibility for the services rendered in this case on behalf of Harris.

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4. My current hourly rate is \$700.00. My hourly rate in 2011 was \$650.00. The hourly rates for the other attorneys and paralegals at McGuireWoods LLP who worked on this case are reflected in the table below.

Attorney/Paralegal	2011 Rate	2012 Rate
Cullen Ann Drescher	\$350.00	n/a
Connie Ferrell	\$260.00	\$270.00
Linda J. Neilson	\$220.00	\$240.00
Kenneth M. Miskin	\$450.00	n/a
Erin Q. Ashcroft	\$365.00	\$400.00

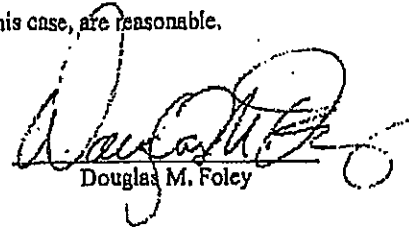
5. These are the actual rates which McGuireWoods LLP charges and has charged paying clients (including Harris) in other cases for the types of services rendered in this case. These hourly rates fall within, and do not exceed, the prevailing market hourly rates in Virginia for similar services by lawyers and paralegals of reasonably comparable skill, experience and reputation.

6. For services and disbursements incurred in connection with the representation of Harris in this case Harris has paid or become obligated to pay attorneys' fees and costs to McGuireWoods LLP in the total amount of \$22,775.54. This figure is comprised of \$22,299.50 in fees and \$476.04 in costs and expenses.

7. Detailed reports of the fees and expenses incurred to date is attached to the Motion as Exhibits 15, 16 and 17).

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8. The amount of fees requested in the Motion, and the hours expended by McGuireWoods LLP in its representation of Harris in this case, are reasonable.



Douglas M. Foley

07415755.1

APPENDIX F

LAFFEY MATRIX – 2014-2015

Years (Rate for June 1 – May 31, based on prior year's CPI-U)

Experience	14-15
20+ years	520
11-19 years	460
8-10 years	370
4-7 years	300
1-3 years	255
Paralegals & Law Clerks	150

Explanatory Notes:

1. This matrix of hourly rates for attorneys of varying experience levels and paralegals/law clerks has been prepared by the Civil Division of the United States Attorney's Office for the District of Columbia. The matrix is intended to be used in cases in which a "fee-shifting" statute permits the prevailing party to recover "reasonable" attorney's fees. *See, e.g.*, 42 U.S.C. § 2000e-5(k) (Title VII of the 1964 Civil Rights Act); 5 U.S.C. § 552(a)(4)(E) (Freedom of Information Act); 28 U.S.C. § 2412(b) (Equal Access to Justice Act). The matrix does not apply to cases in which the hourly rate is limited by statute. *See* 28 U.S.C. § 2412(d).
2. This matrix is based on the hourly rates allowed in *Laffey v. Northwest Airlines, Inc.*, 572 F. Supp. 354 (D.D.C. 1983), *aff'd in part, rev'd in part on other grounds*, 746 F.2d 4 (D.C. Cir. 1984), *cert. denied*, 472 U.S. 1021 (1985). It is commonly referred to by attorneys and federal judges in the District of Columbia as the "Laffey Matrix" or the "United States Attorney's Office Matrix." The various "brackets" in the column headed "Experience" refer to the years following the attorney's graduation from law school, and are intended to correspond to "junior associates" (1-3 years after law school graduation), "senior associates" (4-7 years), "experienced federal court litigators" (8-10 and 11-19 years), and "very experienced federal court litigators" (20 years or more). Thus, the "1-3 years" bracket is generally applicable to attorneys in their first, second, and third years after graduation from law school, and the "4-7 years" bracket generally becomes applicable on the third anniversary of the attorney's graduation (*i.e.*, at the beginning of the fourth year following law school). *See Laffey*, 572 F. Supp. at 371; *but cf. EPIC v. Dep't of Homeland Sec.*, No. 11-2261, ___ F. Supp. 2d ___, 2013 WL 6047561, *6 -*7 (D.D.C. Nov. 15, 2013) (attorney not admitted to bar compensated at "Paralegals & Law Clerks" rate); *EPIC v. Dep't of Homeland Sec.*, 982 F. Supp.2d 56, 60-61 (D.D.C. 2013) (same).
3. The hourly rates approved in *Laffey* were for work done principally in 1981-82. The matrix begins with those rates. *See Laffey*, 572 F. Supp. at 371 (attorney rates) & 386 n.74 (paralegal and law clerk rate). The rates for subsequent yearly periods were determined by adding the change in the cost of living for the Washington, D.C. area to the applicable rate for the prior year, and then rounding to the nearest multiple of \$5 (up if within \$3 of the next multiple of \$5). The result is subject to adjustment if appropriate to ensure that the relationship between the highest rate and the lower rates remains reasonably constant. Changes in the cost of living are measured by the Consumer Price Index for All Urban Consumers (CPI-U) for Washington-Baltimore, DC-MD-VA-WV, as announced by the Bureau of Labor Statistics for May of each year.
4. Use of an updated Laffey Matrix was implicitly endorsed by the Court of Appeals in *Save Our Cumberland Mountains v. Hodel*, 857 F.2d 1516, 1525 (D.C. Cir. 1988) (en banc). The Court of Appeals subsequently stated that parties may rely on the updated *Laffey* Matrix prepared by the United States Attorney's Office as evidence of

prevailing market rates for litigation counsel in the Washington, D.C. area. See *Covington v. District of Columbia*, 57 F.3d 1101, 1105 & n.14, 1109 (D.C. Cir. 1995), *cert. denied*, 516 U.S. 1115 (1996). Most lower federal courts in the District of Columbia have relied on the United States Attorney's Office Matrix, rather than the so-called "Updated Laffey Matrix," as the "benchmark for reasonable fees" in this jurisdiction. *Miller v. Holzmann*, 575 F. Supp. 2d 2, 18 n.29 (D.D.C. 2008) (quoting *Pleasants v. Ridge*, 424 F. Supp. 2d 67, 71 n.2 (D.D.C. 2006)); see, e.g., *Berke v. Bureau of Prisons*, 942 F. Supp. 2d 71, 77 (D.D.C. 2013); *Heller v. District of Columbia*, 832 F. Supp. 2d 32, 40-49 (D.D.C. 2011); *American Lands Alliance v. Norton*, 525 F. Supp. 2d 135, 150 (D.D.C. 2007). But see *Salazar v. District of Columbia*, 123 F. Supp. 2d 8, 14-15 (D.D.C. 2000). The United States Attorney's Office does not use the "Updated Laffey Matrix" to determine whether fee awards under fee shifting statutes are reasonable.

APPENDIX G

Edelman, Combs, Lattner & Goodwin LLC
 20 S. Clark Street
 Suite 1500
 Chicago, IL 60603-3403

438 Hoxie Ave
 Calumet City, IL 60409

Date: 6/08/2016

Regarding: NATIONAL CREDIT ADJUSTERS V. PAXTON, JULIA
 Invoice No: 00052

Services Rendered

<u>Date</u>	<u>Staff</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Charges</u>
8/06/2012	FRG	conf TNH re: Defendant's net worth and Defendant's interest in the entry of a protective order	0.10	\$350.00	\$35.00
8/06/2012	MRT	review file and complaint/assn TNH. conf TNH re: class definition	0.40	\$400.00	\$160.00
8/06/2012	TNH	conf FRG re: Def net worth & interest in the entry of protective order	0.10	\$230.00	\$23.00
8/06/2012	TNH	conf MRT re class definition	0.40	\$230.00	\$92.00
8/09/2012	SC	Edited complaint, redacted exhibits	0.30	\$100.00	\$30.00
8/13/2012	JOL	work on complaint; research	0.50	\$550.00	\$275.00
8/14/2012	SC	Drafted letter to client w/Complaint for approval	0.10	\$100.00	\$10.00
8/14/2012	SC	Drafted motion for class cert, memo in support, DAE, CMC, JOL, TNH appearances, civil cover sheet, summons, letter to process server, letter to atty general. motion to enter/continue class cert	1.10	\$100.00	\$110.00
8/14/2012	SC	Mailed [REDACTED] to client [REDACTED]	0.10	\$100.00	\$10.00
8/16/2012	CMC	class mot & mem	0.30	\$550.00	\$165.00
8/16/2012	MS	reviewed docs, efiled complaint, CCS, DAE's appearance, receipts to MRT	0.40	\$100.00	\$40.00

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8/16/2012	SC	Filed mtn for class cert, memo in support, notice of motion, cmc, jol, tnH appearances, motion to enter and continue class cert, notice of motion	1.00	\$100.00	\$100.00
8/16/2012	SC	Edited complaint, edited class docs	0.10	\$100.00	\$10.00
8/16/2012	TNH	[REDACTED] with the client, [REDACTED] [REDACTED]	0.30	\$230.00	\$69.00
8/17/2012	SC	Phone call to process server re: rate of service	0.10	\$100.00	\$10.00
8/17/2012	SC	Drafted letter to process server, mailed complaint, summons, class cert, memo in support, mtn to enter/continue class cert to process server	0.20	\$100.00	\$20.00
8/17/2012	SC	Updated case info in TM	0.10	\$100.00	\$10.00
8/27/2012	SC	Filed summons returned executed	0.10	\$100.00	\$10.00
8/30/2012	SC	Made binder, logging file	0.60	\$100.00	\$60.00
9/11/2012	SC	Processed atty appearances for D, d's motion for extension to answer, court order granting d's motion for extension	0.10	\$100.00	\$10.00
9/11/2012	SC	Edited amended complaint, redacted exhibit	0.50	\$100.00	\$50.00
9/13/2012	TNH	review amended complaint- edit and revise	0.40	\$230.00	\$92.00
9/14/2012	SC	Drafted [REDACTED] to clients [REDACTED] [REDACTED]	0.10	\$100.00	\$10.00
9/14/2012	SC	edited amended complaint, drafted amended motion for class cert, memo in support of amended motion, fixed exhibits	1.00	\$100.00	\$100.00
10/03/2012	SC	Looked [REDACTED] documents received from NCA [REDACTED] [REDACTED] [REDACTED] [REDACTED]	0.10	\$100.00	\$10.00
10/05/2012	SC	Phone call to client	0.10	\$100.00	\$10.00

10/05/2012	SC	██████████ client ██████████ ██████████	0.10	\$100.00	\$10.00
10/08/2012	SC	Phone calls to client	0.10	\$100.00	\$10.00
10/09/2012	SC	Drafted letter to client	0.10	\$100.00	\$10.00
10/09/2012	SC	Printed docs for TNH for court	0.10	\$100.00	\$10.00
10/10/2012	SC	Phone call to client	0.10	\$100.00	\$10.00
10/10/2012	SC	Processed D's answer, court appearance status report	0.10	\$100.00	\$10.00
10/10/2012	TNH	initial status/P's mtn for class cert	0.50	\$230.00	\$115.00
10/10/2012	TNH	conf client	0.20	\$230.00	\$46.00
10/11/2012	SC	Drafted memo to TNH	0.10	\$100.00	\$10.00
10/11/2012	SC	Phone call w/client	0.10	\$100.00	\$10.00
10/11/2012	SC	Drafted letter to client Mitchell	0.10	\$100.00	\$10.00
10/16/2012	SC	Processed minute order	0.10	\$100.00	\$10.00
10/23/2012	TNH	e-mail to Jennifer Weller	0.10	\$230.00	\$23.00
11/06/2012	CC	Saved ECF file	0.10	\$100.00	\$10.00
11/06/2012	TNH	conf oc re resetting the status date	0.20	\$230.00	\$46.00
11/06/2012	TNH	called judge's clerk to have status reset	0.20	\$230.00	\$46.00
11/08/2012	DAE	conf TNH re oc subpoena	0.10	\$550.00	\$55.00
11/08/2012	TNH	conf DAE re oc subpoena	0.10	\$230.00	\$23.00
11/12/2012	SC	Processed subpoena to Adrian Rubin, minute order resetting status	0.10	\$100.00	\$10.00
11/15/2012	SC	Phone call from client	0.10	\$100.00	\$10.00
11/15/2012	SC	Phone call to client	0.10	\$100.00	\$10.00
11/15/2012	TNH	e-mail from and to client	0.10	\$230.00	\$23.00
11/28/2012	SC	Printed docs for TNH for court	0.10	\$100.00	\$10.00

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11/29/2012	SC	conf TNH re docs for court	0.10	\$100.00	\$10.00
11/29/2012	TNH	Status Hearing	0.60	\$230.00	\$138.00
11/29/2012	TNH	conf SC re docs for court	0.10	\$230.00	\$23.00
11/30/2012	SC	Processed court appearance status report	0.10	\$100.00	\$10.00
12/03/2012	SC	Processed court order of 11/29/12	0.10	\$100.00	\$10.00
12/04/2012	CC	Saved ECF file	0.10	\$100.00	\$10.00
12/17/2012	SC	Processed court orders, notice of subpoena	0.10	\$100.00	\$10.00
12/19/2012	CC	Saved ECF file	0.10	\$100.00	\$10.00
12/27/2012	SC	Phone call to client	0.10	\$100.00	\$10.00
1/02/2013	SC	Drafted letter to OC re: subpoenas	0.10	\$100.00	\$10.00
1/11/2013	DAE	conf TNH re no judge assigned	0.10	\$550.00	\$55.00
1/11/2013	TNH	e-mail to and from Jennifer Weller re subpoenas	0.10	\$230.00	\$23.00
1/11/2013	TNH	conf DAE re no judge assigned	0.10	\$230.00	\$23.00
1/16/2013	CMC	conf DAE and TNH re amending the complaint	0.20	\$550.00	\$110.00
1/16/2013	DAE	conf TNH re client's loan docs	0.40	\$550.00	\$220.00
1/16/2013	DAE	conf TNH and CMC re amending complaint	0.20	\$550.00	\$110.00
1/16/2013	DAE	conf TNH re client's [REDACTED]	0.20	\$550.00	\$110.00
1/16/2013	DAE	conf TNH and SC	0.20	\$550.00	\$110.00
1/16/2013	DAE	prepare amended complaint and motion for leave to file it	3.00	\$550.00	\$1,650.00
1/16/2013	SC	Looked at Pacer for bankruptcy	0.20	\$100.00	\$20.00
1/16/2013	SC	conf TNH and DAE	0.20	\$100.00	\$20.00

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1/16/2013	SC	Phone call to client	0.10	\$100.00	\$10.00
1/16/2013	TNH	conf DAE re client's [REDACTED] [REDACTED]	0.20	\$230.00	\$46.00
1/16/2013	TNH	conf DAE and SC	0.20	\$230.00	\$46.00
1/16/2013	TNH	review client file [REDACTED] [REDACTED]	0.30	\$230.00	\$69.00
1/16/2013	TNH	conf DAE re client's loan docs	0.40	\$230.00	\$92.00
1/16/2013	TNH	conf DAE and CMC re amending the complaint	0.20	\$230.00	\$46.00
1/18/2013	DAE	email from and to TNH re filing amended complaint today	0.00	\$550.00	\$0.00
1/18/2013	SC	Edited amended complaint, motion for leave to amend, drafted amended motion for class cert, memo in support	2.30	\$100.00	\$230.00
1/18/2013	TNH	e-mail from and to DAE re filing amended complaint today	0.10	\$230.00	\$23.00
1/18/2013	TNH	review DAE's revisions to the class mtn and class memorandum	0.10	\$230.00	\$23.00
1/21/2013	SC	filed motion for leave to file amended complaint, motion for class cert, memo in support, prepared courtesy copy	0.50	\$100.00	\$50.00
1/21/2013	SC	Edited amended motion for class cert, memo in support	0.40	\$100.00	\$40.00
1/21/2013	SC	Edited memo in support of amended motion for class cert	0.20	\$100.00	\$20.00
1/21/2013	TNH	review amended complaint and class papers	0.20	\$230.00	\$46.00
1/28/2013	CC	Saved ECF File	0.10	\$100.00	\$10.00
1/30/2013	SC	Processed mtn for leave to file amended complaint, mtn for class cert, notices of mtns, court order	0.10	\$100.00	\$10.00
2/05/2013	SC	Printed docs for TNH for court	0.10	\$105.00	\$10.50

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2/07/2013	CC	Saved ECF File	0.10	\$105.00	\$10.50
2/07/2013	TNH	e-mail to Weller re Rule 26f Conference	0.10	\$290.00	\$29.00
2/11/2013	TNH	e-mail to OC re rule 26f conference	0.10	\$290.00	\$29.00
2/12/2013	TNH	conf J Weller re rescheduling Rule 26f conference	0.10	\$290.00	\$29.00
2/14/2013	TNH	conf J Weller re Rule 26f conference-rescheduled as per Weller's request	0.10	\$290.00	\$29.00
2/18/2013	FRG	conf MRT and TNH re Judge Grady's Disc Deadline Procedures	0.30	\$445.00	\$133.50
2/18/2013	MRT	conf TNH and FRG re Judge Grady's Disc Deadline procedures	0.30	\$400.00	\$120.00
2/18/2013	SC	Processed court order	0.10	\$105.00	\$10.50
2/18/2013	TNH	Rule 26f conference with J Weller	0.30	\$290.00	\$87.00
2/18/2013	TNH	CONF MRT AND FRG RE JUDGE GRADY'S DISCOVERY DEADLINE PROCEDURES	0.30	\$290.00	\$87.00
2/19/2013	SC	Docketed deadline for 26(a)(1)s	0.10	\$105.00	\$10.50
2/19/2013	SC	Drafted discovery requests	0.40	\$105.00	\$42.00
2/21/2013	SC	Phone call to client	0.10	\$105.00	\$10.50
2/21/2013	SC	Phone call from client	0.10	\$105.00	\$10.50
2/21/2013	SC	Edited discovery requests	0.60	\$105.00	\$63.00
2/26/2013	CC	Saved ECF File	0.10	\$105.00	\$10.50
3/04/2013	SC	Edited discovery requests	0.50	\$105.00	\$52.50
3/05/2013	DAE	conf TNH re revisions to disc requests	0.20	\$550.00	\$110.00
3/05/2013	SC	Edited discovery requests	0.20	\$105.00	\$21.00
3/05/2013	TNH	conf DAE and SC re revisions to discovery requests	0.20	\$290.00	\$58.00
3/07/2013	SC	Edited discovery requests	0.20	\$105.00	\$21.00

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3/07/2013	TNH	edit and revise discovery requests	0.50	\$290.00	\$145.00
3/08/2013	FRG	conf TNH re: Plaintiff's First Set of Discovery requests	0.10	\$445.00	\$44.50
3/08/2013	TNH	conf FRG re annual interest rate	0.30	\$290.00	\$87.00
3/11/2013	SC	Edited discovery requests	0.10	\$105.00	\$10.50
3/12/2013	SC	Faxed, mailed, emailed disc requests to D	0.10	\$105.00	\$10.50
3/12/2013	SC	Processed disc requests and memo to docket	0.10	\$105.00	\$10.50
3/12/2013	SC	Docketed d's disc deadline	0.10	\$105.00	\$10.50
3/12/2013	SC	Drafted 26(a)(1) disclosures, prepared documents	0.40	\$105.00	\$42.00
3/18/2013	SC	Sent 26a1s to OC	0.20	\$105.00	\$21.00
3/20/2013	SC	Processed P's 26a1 disclosures	0.10	\$105.00	\$10.50
3/22/2013	DAE	email to and from TNH re status of case	0.10	\$550.00	\$55.00
3/22/2013	TNH	e-mail to and from DAE re status of case	0.10	\$290.00	\$29.00
4/08/2013	DAE	email to and from TNH and JWeller re extension re Disc	0.10	\$550.00	\$55.00
4/08/2013	TNH	conf J Weller re discovery extension	0.10	\$290.00	\$29.00
4/08/2013	TNH	e-mail to and from DAE and Jweller re extension re discovery	0.10	\$290.00	\$29.00
4/09/2013	SC	Docketed D's deadline to respond to discovery	0.10	\$105.00	\$10.50
4/10/2013	SC	Processed email to OC	0.10	\$105.00	\$10.50
4/12/2013	DAE	conf TNH and FRG re FRE 502	0.30	\$550.00	\$165.00
4/12/2013	TNH	conf FRG and DAE re FRE 502	0.30	\$290.00	\$87.00
4/16/2013	CMC	conf TNH re 502 mtn and proposed revisions	0.10	\$550.00	\$55.00

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4/16/2013	FRG	conf. TNH re: FRE 502(d) order; to J. Weller re: same	0.40	\$445.00	\$178.00
4/16/2013	FRG	conf TNH re def's mtn and proposed revisions	0.30	\$445.00	\$133.50
4/16/2013	FRG	joint call with TNH and JWeller re motion	0.10	\$445.00	\$44.50
4/16/2013	SC	Emailed OC w/exhibits	0.10	\$105.00	\$10.50
4/16/2013	TNH	joint call with FRG and J Weller re mtn	0.10	\$290.00	\$29.00
4/16/2013	TNH	e-mail to J Weller re Word version of mtn	0.10	\$290.00	\$29.00
4/16/2013	TNH	review and revision 502 mtn	0.30	\$290.00	\$87.00
4/16/2013	TNH	conf CMC re 502 mtn and proposed revisions	0.10	\$290.00	\$29.00
4/16/2013	TNH	conf FRG re def's mtn and proposed revisions	0.30	\$290.00	\$87.00
4/18/2013	SC	Typed D's draft 502 order into word, made ECLG redlines	0.30	\$105.00	\$31.50
4/19/2013	SC	Edited draft 502 order	0.10	\$105.00	\$10.50
4/22/2013	DAE	conf TNH re settlement and def's req for Disc extension	0.30	\$550.00	\$165.00
4/22/2013	SC	Emailed redlines to protective order to OC	0.10	\$105.00	\$10.50
4/22/2013	TNH	conf J Weller re settlement and discovery	0.20	\$290.00	\$58.00
4/22/2013	TNH	conf DAE re settlement and def's request for a discovery extension	0.30	\$290.00	\$87.00
4/24/2013	DAE	conf TNH re agreeing to disc extension	0.20	\$550.00	\$110.00
4/24/2013	TNH	conf J Weller re discovery extension	0.20	\$290.00	\$58.00
4/24/2013	TNH	conf DAE re agreeing to discovery extension	0.20	\$290.00	\$58.00
5/01/2013	SC	Phone call to client	0.10	\$105.00	\$10.50

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5/01/2013	SC	Phone call from client	0.20	\$105.00	\$21.00
5/02/2013	SC	Processed D's disc resps	0.10	\$105.00	\$10.50
5/06/2013	SC	Docketed P's deadline to resp to disc requests	0.10	\$105.00	\$10.50
5/06/2013	SC	Drafted letter to client	0.10	\$105.00	\$10.50
5/06/2013	SC	Typed D's disc requests into WP	0.40	\$105.00	\$42.00
5/07/2013	SC	Drafted letter to client [REDACTED] [REDACTED] [REDACTED]	0.20	\$105.00	\$21.00
5/08/2013	SC	Processed letter to client, memo to docket	0.10	\$105.00	\$10.50
5/09/2013	SC	Docketed disc reminders	0.10	\$105.00	\$10.50
5/10/2013	CC	Saved ECF File	0.10	\$105.00	\$10.50
5/13/2013	SC	Processed court order, D's 26a1s, memo to docket	0.10	\$105.00	\$10.50
5/15/2013	DAE	conf TNH re Weller's suggestion re confidentiality order	0.10	\$550.00	\$55.00
5/15/2013	TNH	conf DAE re Weller's suggestion re confidentiality order	0.10	\$290.00	\$29.00
5/15/2013	TNH	e-mail to and from J Weller re joint mtn for entry of protective order	0.10	\$290.00	\$29.00
5/16/2013	CMC	conf TNH re Weller's proposed confidentiality language	0.10	\$550.00	\$55.00
5/16/2013	DAE	conf TNH re settlement and Weller's position re protective order	0.20	\$550.00	\$110.00
5/16/2013	DAE	emails with TNH re Weller's language re confidentiality order	0.20	\$550.00	\$110.00
5/16/2013	TNH	conf DAE re settlement and Weller's position re protective order	0.20	\$290.00	\$58.00
5/16/2013	TNH	e-mails to and from J Weller re protective order	0.30	\$290.00	\$87.00

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5/16/2013	TNH	e-mails to and from DAE re J Weller's proposed language re confidentiality order	0.20	\$290.00	\$58.00
5/16/2013	TNH	conf CMC re J Weller's proposed confidentiality language	0.10	\$290.00	\$29.00
5/20/2013	DAE	conf TNH and JOL re Def revisions to protective order	0.30	\$550.00	\$165.00
5/20/2013	FRG	conf. TNH re: draft protective order	0.10	\$445.00	\$44.50
5/20/2013	JOL	conf DAE and TNH re Def revisions to protective order	0.30	\$550.00	\$165.00
5/20/2013	SC	Drafted motion for entry of conf order, drafted conf order in Word w/redlines	0.80	\$105.00	\$84.00
5/20/2013	SC	Edited conf order, motion, filed, prepared courtesy copy	0.90	\$105.00	\$94.50
5/20/2013	TNH	conf J Weller re protective order	0.20	\$290.00	\$58.00
5/20/2013	TNH	conf FRG re protective order	0.10	\$290.00	\$29.00
5/20/2013	TNH	conf DAE and JOL re Def's revisions to protective order	0.30	\$290.00	\$87.00
5/20/2013	TNH	e-mails from J Weller re protective order	0.10	\$290.00	\$29.00
5/21/2013	SC	Made redlines in WP to conf order, emailed to judge	0.20	\$105.00	\$21.00
5/21/2013	SC	Processed mtn for entry of conf order	0.10	\$105.00	\$10.50
5/21/2013	TNH	court called re redline version of protective order	0.10	\$290.00	\$29.00
5/22/2013	DAE	conf TNH re following up on disc	0.10	\$550.00	\$55.00
5/22/2013	TNH	e-mail to Weller re class size	0.20	\$290.00	\$58.00
5/22/2013	TNH	conference call with client	0.30	\$290.00	\$87.00
5/22/2013	TNH	conf DAE re following up on discovery	0.10	\$290.00	\$29.00
5/23/2013	SC	Processed court order	0.10	\$105.00	\$10.50
5/24/2013	SC	Docketed PC w/client	0.10	\$105.00	\$10.50

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Date	Case	Description	Hours	Rate	Amount
5/24/2013	SC	PC to client	0.10	\$105.00	\$10.50
5/28/2013	SC	Processed memo to docket	0.10	\$105.00	\$10.50
5/30/2013	SC	Phone call from/to client	0.10	\$105.00	\$10.50
5/30/2013	SC	Docketed PC w/client	0.10	\$105.00	\$10.50
5/31/2013	TNH	e-mail to and from Weller re status of class discovery info and request for an extension to serve plaintiff's discovery responses	0.30	\$290.00	\$87.00
5/31/2013	TNH	conf client	0.10	\$290.00	\$29.00
5/31/2013	TNH	called client 2x left voicemail messages	0.10	\$290.00	\$29.00
6/03/2013	DAE	conf TNH re status of disc	0.20	\$550.00	\$110.00
6/03/2013	SC	Docketed PC w/client, updated disc deadline	0.10	\$105.00	\$10.50
6/03/2013	TNH	conf DAE re status of discovery	0.20	\$290.00	\$58.00
6/04/2013	TNH	client	1.30	\$290.00	\$377.00
6/05/2013	SC	[REDACTED] of client	0.30	\$105.00	\$31.50
6/05/2013	SC	PC w/client	0.10	\$105.00	\$10.50
6/05/2013	SC	Docketed PC w/client w/TNH	0.10	\$105.00	\$10.50
6/06/2013	DAE	conf TNH re disc requests	0.20	\$550.00	\$110.00
6/06/2013	FRG	conf. TNH re: defendant's discovery requests	0.10	\$445.00	\$44.50
6/06/2013	TNH	conf DAE and FRG re discovery requests	0.20	\$290.00	\$58.00
6/06/2013	TNH	reviewed discovery	1.00	\$290.00	\$290.00
6/07/2013	SC	Processed email to client	0.10	\$105.00	\$10.50
6/10/2013	TNH	e-mail to Jennifer Weller re status of discovery	0.10	\$290.00	\$29.00

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Date	Client	Description	Hours	Rate	Amount
6/12/2013	CMC	class info	0.20	\$550.00	\$110.00
6/13/2013	DAE	conf TNH re conf with Weller and class info	0.20	\$550.00	\$110.00
6/13/2013	TNH	conf DAE re conf with Weller and class information	0.20	\$290.00	\$58.00
6/13/2013	TNH	draft client's discovery responses	2.20	\$290.00	\$638.00
6/13/2013	TNH	conf Weller re settlement and getting class information	0.20	\$290.00	\$58.00
6/14/2013	DAE	conf TNH re disc responses, other litigation	0.30	\$550.00	\$165.00
6/14/2013	SC	conf TNH and DAE re discovery responses and other litigation	0.30	\$105.00	\$31.50
6/14/2013	SC	Edited discovery responses, [REDACTED] client [REDACTED]	0.80	\$105.00	\$84.00
6/14/2013	SC	PC to client	0.10	\$105.00	\$10.50
6/14/2013	TNH	conf SC and DAE re discovery responses- other litigation	0.30	\$290.00	\$87.00
6/17/2013	SC	[REDACTED] sent to client [REDACTED]	0.40	\$105.00	\$42.00
6/17/2013	SC	PC to client	0.10	\$105.00	\$10.50
6/20/2013	SC	Processed court order, disc responses	0.10	\$105.00	\$10.50
6/24/2013	SC	Docketed updated info for conf call	0.10	\$105.00	\$10.50
6/26/2013	SC	Prepared memo for TNH re: status of case	0.20	\$105.00	\$21.00
6/26/2013	SC	Drafted letter to client	0.10	\$105.00	\$10.50
6/27/2013	MRT	conf TNH re date for settlement conf	0.10	\$445.00	\$44.50
6/27/2013	TNH	conf MRT re date for settlement conference	0.10	\$290.00	\$29.00
6/28/2013	SC	Docketed settl conf reminders	0.10	\$105.00	\$10.50

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6/28/2013	SC	Edited letter to client	0.10	\$105.00	\$10.50
7/01/2013	DAE	emails with Weller and TNH re staying disc	0.10	\$550.00	\$55.00
7/01/2013	SC	Processed memo to docket	0.10	\$105.00	\$10.50
7/01/2013	TNH	e-mails to and from Weller and DAE re staying discovery	0.10	\$290.00	\$29.00
7/08/2013	SC	Processed motion, court order	0.10	\$105.00	\$10.50
7/10/2013	CC	Saved ECF Files	0.10	\$105.00	\$10.50
7/12/2013	CC	Saved ECF Files.	0.10	\$105.00	\$10.50
7/15/2013	SC	Processed court order, amended mtn for class cert	0.10	\$105.00	\$10.50
7/18/2013	DAE	conf TNH and MRT re settlement conf and info needed to make settlement demand	0.30	\$550.00	\$165.00
7/18/2013	MRT	conf TNH and DAE re settlement conf and info needed for settlement demand	0.30	\$445.00	\$133.50
7/18/2013	TNH	conf DAE and MRT re settlement conference and information needed to make a settlement demand	0.30	\$290.00	\$87.00
7/29/2013	SC	Drafted letter to client [REDACTED]	0.10	\$105.00	\$10.50
8/05/2013	DAE	emails with TNH, MRT, OC re settlement	0.30	\$550.00	\$165.00
8/05/2013	DAE	conf TNH re settlement position letter	0.10	\$550.00	\$55.00
8/05/2013	MRT	emails with TNH, DAE, OC re settlement	0.30	\$445.00	\$133.50
8/05/2013	TNH	conf DAE re settlement position letter	0.10	\$290.00	\$29.00
8/05/2013	TNH	e-mails from DAE and MRT and OC re settlement	0.30	\$290.00	\$87.00
8/06/2013	SC	Processed email between dae and oc	0.10	\$105.00	\$10.50
8/07/2013	SC	Drafted memo to TNH re: ECLG fees in case	0.10	\$105.00	\$10.50

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8/09/2013	SC	Processed letter from OC w/sett info	0.10	\$105.00	\$10.50
8/12/2013	DAE	conf TNH re add info from Weller	0.10	\$550.00	\$55.00
8/12/2013	TNH	conf DAE re additional information from J Weller	0.10	\$290.00	\$29.00
8/13/2013	SC	Drafted memo re: case for TNH for settlement memo	0.20	\$105.00	\$21.00
8/13/2013	SC	Printed all docs for case for JOL	0.10	\$105.00	\$10.50
8/13/2013	TNH	work on settlement letter	8.20	\$290.00	\$2,378.00
8/14/2013	FRG	conf. TNH re: settlement structure	0.10	\$445.00	\$44.50
8/14/2013	JOL	conf TNH and FRG re debt release class	0.30	\$550.00	\$165.00
8/14/2013	MRT	conf TNH re revisions to braxton class	0.40	\$445.00	\$178.00
8/14/2013	TNH	conf MRT re revisions re Braxton class	0.40	\$290.00	\$116.00
8/14/2013	TNH	conf JOL and FRG re debt release class	0.30	\$290.00	\$87.00
8/14/2013	TNH	called client and left vm message	0.10	\$290.00	\$29.00
8/14/2013	TNH	edit and revise letter as per DAE	0.50	\$290.00	\$145.00
8/16/2013	SC	Drafted global settlement demand	0.20	\$105.00	\$21.00
8/16/2013	SC	PCs to client, left VMs, PC to client's office	0.20	\$105.00	\$21.00
8/19/2013	CMC	settlement conf	4.00	\$550.00	\$2,200.00
8/19/2013	DAE	emails with TNH re insurance and net worth	0.40	\$550.00	\$220.00
8/19/2013	DAE	sett conf in Hammond	4.00	\$550.00	\$2,200.00
8/19/2013	MRT	conf TNH re: progress at settlement conf/check ins. info disclosed and inform TNH of same.	0.40	\$445.00	\$178.00
8/19/2013	SC	Processed settlement mem to judge cherry	0.10	\$105.00	\$10.50

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8/19/2013	TNH	conf MRT re progress at settlement conf/check ins info disclosed	0.40	\$290.00	\$116.00
8/19/2013	TNH	e-mails to and from DAE re insurance and net worth	0.40	\$290.00	\$116.00
8/19/2013	TNH	research Jones v. NCA file [REDACTED] [REDACTED]	0.50	\$290.00	\$145.00
8/20/2013	DAE	emails with MRT & TNH re settlement conf/no resolution of IL/NY cases	0.30	\$550.00	\$165.00
8/20/2013	MRT	emails from DAE and TNH re: settlement conference/no resolution of IL and NY cases	0.30	\$445.00	\$133.50
8/20/2013	SC	Drafted letter to OC re: insurance policies	0.10	\$105.00	\$10.50
8/20/2013	TNH	emails with MRT & DAE re settlement conf/no resolution of IL & NY cases	0.30	\$290.00	\$87.00
8/22/2013	SC	Processed letter to d re: ins policy	0.10	\$105.00	\$10.50
8/26/2013	SC	conf TNH re letter or mtn to ct re status of settlement	0.20	\$105.00	\$21.00
8/26/2013	SC	Looked at judge's rules re: notifying re: settl conf	0.10	\$105.00	\$10.50
8/26/2013	SC	Processed ndin order	0.10	\$105.00	\$10.50
8/26/2013	TNH	conf SC re letter or mtn to court re status of settlement	0.20	\$290.00	\$58.00
9/13/2013	SC	Drafted follow up letter to OC w/insurance policy	0.10	\$105.00	\$10.50
9/27/2013	TNH	e-mail from JWeller	0.10	\$290.00	\$29.00
9/30/2013	SC	Emailed client	0.10	\$105.00	\$10.50
10/01/2013	TNH	e-mail to oc re status of discovery responses	0.10	\$290.00	\$29.00
10/02/2013	SC	processed email to OC	0.10	\$105.00	\$10.50
10/02/2013	TNH	e-mail from J Weller re Rule 37 conference	0.10	\$290.00	\$29.00

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10/02/2013	TNH	e-mail to Weller re Rule 37 conference	0.10	\$290.00	\$29.00
10/04/2013	SC	Made redwall of insurance policies	0.10	\$105.00	\$10.50
10/09/2013	SC	Processed D's insurance policy	0.10	\$125.00	\$12.50
10/09/2013	TNH	Status Hearing	1.00	\$325.00	\$325.00
10/10/2013	SC	Drafted letters to insurance cos	0.20	\$125.00	\$25.00
10/10/2013	SC	Mailed letters to insurance cos	0.10	\$125.00	\$12.50
10/10/2013	SC	Processed letters to insurance, memos to docket	0.10	\$125.00	\$12.50
10/16/2013	JM	saved ECF file	0.10	\$125.00	\$12.50
10/21/2013	TNH	call from Chubb Insurance Co	0.10	\$325.00	\$32.50
10/25/2013	TNH	e-mail from J Weller re Rule 37 conference	0.10	\$325.00	\$32.50
10/28/2013	SC	Processed memo to docket	0.10	\$125.00	\$12.50
10/28/2013	TNH	review Def's discovery responses in preparation for Rule 37 conference	1.20	\$325.00	\$390.00
10/28/2013	TNH	Rule 37 conference with Jennifer Weller	0.50	\$325.00	\$162.50
10/29/2013	SC	Processed memo to docket	0.10	\$125.00	\$12.50
11/01/2013	SC	Drafted outline for supp disc resps	0.20	\$125.00	\$25.00
11/21/2013	TNH	e-mail to J Weller	0.10	\$325.00	\$32.50
12/02/2013	SC	PC to client	0.10	\$125.00	\$12.50
12/03/2013	SC	PC from client	0.10	\$125.00	\$12.50
12/17/2013	TNH	CALLED JENNIFER WELLER	0.10	\$325.00	\$32.50
1/15/2014	TNH	conf J Weller re discovery	0.10	\$325.00	\$32.50
1/15/2014	TNH	returned Jennifer Weller's call	0.10	\$325.00	\$32.50
1/20/2014	DAE	Conf TNH re supplementing client's discovery responses	0.10	\$600.00	\$60.00

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1/20/2014	TNH	RESEARCH PRIOR DISCOVERY RESPONSES	0.40	\$325.00	\$130.00
1/20/2014	TNH	e-mail to client	0.10	\$325.00	\$32.50
1/20/2014	TNH	conf DAE re supplementing client's discovery responses	0.10	\$325.00	\$32.50
1/20/2014	TNH	CALLED CLIENT AND LEFT VOICEMAIL MESSAGE	0.10	\$325.00	\$32.50
1/21/2014	DAE	Conf TNH re discovery and supplementing client's discovery responses	0.20	\$600.00	\$120.00
1/21/2014	DAE	note to TNH re mtn to compel	0.10	\$600.00	\$60.00
1/21/2014	SC	Conf TNH re client's discovery responses and supplementing	0.20	\$125.00	\$25.00
1/21/2014	SC	Conf TNH re supplementing client's discovery responses	0.20	\$125.00	\$25.00
1/21/2014	SC	Looked in binders for previous discovery response drafts, edited supplemental discovery responses	0.30	\$125.00	\$37.50
1/21/2014	SC	Processed d's supp disc, made redwall	0.20	\$125.00	\$25.00
1/21/2014	TNH	e-mail from J Weller re discovery	0.10	\$325.00	\$32.50
1/21/2014	TNH	note from DAE re mtn to compel	0.10	\$325.00	\$32.50
1/21/2014	TNH	conf SC re client's discovery responses and supplementing	0.20	\$325.00	\$65.00
1/21/2014	TNH	conf client	0.20	\$325.00	\$65.00
1/21/2014	TNH	conf SC re supplementing client's discovery responses	0.20	\$325.00	\$65.00
1/21/2014	TNH	called client and left voicemail message	0.10	\$325.00	\$32.50
1/21/2014	TNH	conf DAE re discovery and supplementing client's discovery responses	0.20	\$325.00	\$65.00
1/22/2014	CMC	Rule 37 letter	1.10	\$600.00	\$660.00

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1/22/2014	CMC	Conf TNH re def's supplemental discovery responses	0.10	\$600.00	\$60.00
1/22/2014	DAE	Conf TNH re dep notice (in person)	0.20	\$600.00	\$120.00
1/22/2014	DAE	Conf TNH re client's [REDACTED] [REDACTED]	0.10	\$600.00	\$60.00
1/22/2014	SC	Conf TNH revisions to Dep notice	0.30	\$125.00	\$37.50
1/22/2014	SC	Conf TNH re settlement documents	0.20	\$125.00	\$25.00
1/22/2014	SC	[REDACTED] sent to client [REDACTED] [REDACTED]	0.50	\$125.00	\$62.50
1/22/2014	TNH	conf DAE re dep notice (in person)	0.20	\$325.00	\$65.00
1/22/2014	TNH	conf SC revisions to Dep notice	0.30	\$325.00	\$97.50
1/22/2014	TNH	voicemail message from the client	0.10	\$325.00	\$32.50
1/22/2014	TNH	copied on e-mail from DAE to CMC re discovery	0.10	\$325.00	\$32.50
1/22/2014	TNH	conf SC re settlement documents	0.20	\$325.00	\$65.00
1/22/2014	TNH	conf DAE re client's [REDACTED] [REDACTED]	0.10	\$325.00	\$32.50
1/22/2014	TNH	conf CMC re def's supplemental discovery responses	0.10	\$325.00	\$32.50
1/23/2014	CMC	work on disc lett	1.30	\$600.00	\$780.00
1/23/2014	CMC	conf TNH re rule 37 letter to J Weller	0.30	\$600.00	\$180.00
1/23/2014	CMC	Discuss motion to compel with DAE, TNH	0.30	\$600.00	\$180.00
1/23/2014	DAE	read/resp to TNH emails re client's inquiry	0.20	\$600.00	\$120.00
1/23/2014	DAE	Conf w/SC re: dates for depositions	0.10	\$600.00	\$60.00
1/23/2014	DAE	conf TNH re disco responses	0.10	\$600.00	\$60.00
1/23/2014	DAE	discuss motion to compel with CMC, TNH	0.30	\$600.00	\$180.00

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Date	Party	Description	Hours	Rate	Amount
1/23/2014	FRG	conf TNH re issues serving dep notice at Hinshaw.1	0.00	\$500.00	\$0.00
1/23/2014	SC	conf TNH re depo notice	0.30	\$125.00	\$37.50
1/23/2014	SC	conf TNH re issues re servingdeps notice at Hinshaw	0.20	\$125.00	\$25.00
1/23/2014	SC	Edited supplemental dis responses, conf w/TNH re: responses, typed d's supplemental disc into WP, edited dep notice, emails to court reporter re: location for dep	2.10	\$125.00	\$262.50
1/23/2014	SC	Emails w/court reporters re: location for deps	0.20	\$125.00	\$25.00
1/23/2014	SC	Conf w/DAE re: dates for deps	0.10	\$125.00	\$12.50
1/23/2014	TNH	conf DAE re revisions to client's discovery responses	0.10	\$325.00	\$32.50
1/23/2014	TNH	review and revise client's discovery responses	0.10	\$325.00	\$32.50
1/23/2014	TNH	conf SC re deposition notice	0.30	\$325.00	\$97.50
1/23/2014	TNH	called J Weller re serving discovery responses and deposition notice	0.10	\$325.00	\$32.50
1/23/2014	TNH	called Dave Schultz re serving discovery responses and deposition notice	0.10	\$325.00	\$32.50
1/23/2014	TNH	conf SC re issues re serving deps notice at Hinshaw	0.20	\$325.00	\$65.00
1/23/2014	TNH	conf FRG re issues re serving dep notice at Hinshaw	0.10	\$325.00	\$32.50
1/23/2014	TNH	conf CMC re Rule 37 letter to J Weller	0.30	\$325.00	\$97.50
1/23/2014	TNH	e-mail to J Weller re scheduling client's dep	0.10	\$325.00	\$32.50
1/23/2014	TNH	conf DAE re disco responses	0.10	\$325.00	\$32.50
1/23/2014	TNH	Conf w/DAE re: responses, typed d's supplemental disc into WP, edited dep notice, emails to court reporter re: location for dep	2.10	\$325.00	\$682.50

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1/23/2014	TNH	read client email	0.10	\$325.00	\$32.50
1/23/2014	TNH	e-mail to and from DAE re client's inquiry	0.20	\$325.00	\$65.00
1/24/2014	CMC	work on rule 37 letter	2.60	\$600.00	\$1,560.00
1/24/2014	SC	PC to client	0.20	\$125.00	\$25.00
1/24/2014	SC	Emailed TNH re: dates of dep	0.10	\$125.00	\$12.50
1/24/2014	SC	Processed notice of deps, supp disc	0.10	\$125.00	\$12.50
1/27/2014	DAE	conf TNH re disco and doc production	0.30	\$600.00	\$180.00
1/27/2014	SC	Edited rule 37 letter, emailed to OC	0.30	\$125.00	\$37.50
1/27/2014	TNH	review Rule 37 letter	0.30	\$325.00	\$97.50
1/27/2014	TNH	conf CMC re discovery	0.30	\$325.00	\$97.50
1/27/2014	TNH	review doc production	0.40	\$325.00	\$130.00
1/27/2014	TNH	conf DAE re discovery and doc production	0.30	\$325.00	\$97.50
1/27/2014	TNH	e-mail from J Weller re deps	0.10	\$325.00	\$32.50
1/28/2014	CMC	Disc conf	1.00	\$600.00	\$600.00
1/28/2014	CMC	debrief with DAE and TNH	0.30	\$600.00	\$180.00
1/28/2014	CMC	conf TNH re prep for rule 37 conference	0.20	\$600.00	\$120.00
1/28/2014	DAE	conf TNH [REDACTED] [REDACTED]	0.10	\$600.00	\$60.00
1/28/2014	DAE	conf TNH re rule 37 conference	0.10	\$600.00	\$60.00
1/28/2014	DAE	debrief with THN and CMC	0.30	\$600.00	\$180.00
1/28/2014	SC	Printed docs for TNH PC	0.20	\$125.00	\$25.00
1/28/2014	SC	Processed rule 37 letters	0.10	\$125.00	\$12.50
1/28/2014	TNH	conf DAE re sending Juston deposition transcript to Jennifer Weller	0.10	\$325.00	\$32.50

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1/28/2014	TNH	e-mail Huston Dep transcript to Jennifer Weller	0.10	\$325.00	\$32.50
1/28/2014	TNH	update personal calendar with Rule 37 conference date	0.10	\$325.00	\$32.50
1/28/2014	TNH	review docs re Rule 37 conference with Jennifer Weller	0.40	\$325.00	\$130.00
1/28/2014	TNH	conf DAE re rule 37 conference with DAE	0.10	\$325.00	\$32.50
1/28/2014	TNH	conf CMC re preparing for Rule 37 conference	0.20	\$325.00	\$65.00
1/28/2014	TNH	Rule 37 conf with J Weller and CMC	0.50	\$325.00	\$162.50
1/28/2014	TNH	debrief with CMC and DAE	0.30	\$325.00	\$97.50
1/29/2014	SC	PC to client, left VM	0.10	\$125.00	\$12.50
1/29/2014	SC	conf TNH re disclosure of expert - block	0.30	\$125.00	\$37.50
1/29/2014	SC	Drafted letter to client [REDACTED]	0.20	\$125.00	\$25.00
1/29/2014	SC	Edited letter to Block	0.20	\$125.00	\$25.00
1/29/2014	TNH	conf SC re disclosure of expert- Block	0.30	\$325.00	\$97.50
1/30/2014	SC	PC to client	0.20	\$125.00	\$25.00
1/30/2014	SC	Drafted [REDACTED] client	0.60	\$125.00	\$75.00
1/30/2014	SC	Emailed letter to client	0.10	\$125.00	\$12.50
1/30/2014	SC	conf TNH re client banking info	0.10	\$125.00	\$12.50
1/30/2014	SC	Mailed letter to block	0.10	\$125.00	\$12.50
1/30/2014	SC	Looked up expert witness models	0.30	\$125.00	\$37.50
1/30/2014	TNH	conf SC re client banking info	0.10	\$325.00	\$32.50
1/31/2014	TNH	conf call with J Weller	0.10	\$325.00	\$32.50
2/03/2014	SC	Edited letter to expert, emailed with protective orders, conf w/TNH re; letter/protective orders	0.40	\$125.00	\$50.00

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2/03/2014	SC	conf TNH re protective order and retaining financial expert	0.30	\$125.00	\$37.50
2/03/2014	SC	Looked up [REDACTED] [REDACTED] drafted letter to [REDACTED]	0.30	\$125.00	\$37.50
2/03/2014	TNH	conf Rob Block re case	0.20	\$325.00	\$65.00
2/03/2014	TNH	read email from J Weller re conference call	0.10	\$325.00	\$32.50
2/03/2014	TNH	conf SC re protective order and retaining financial expert	0.30	\$325.00	\$97.50
2/03/2014	TNH	e-mail to JWeller re Rule 37 conference tomorrow	0.10	\$325.00	\$32.50
2/04/2014	SC	read email from TNH re supp disco and sending a rule 37 letter	0.30	\$125.00	\$37.50
2/04/2014	TNH	review Def's discovery responses	0.50	\$325.00	\$162.50
2/04/2014	TNH	e-mail from Robert Block re signed confidentiality orders	0.10	\$325.00	\$32.50
2/04/2014	TNH	Rule 37 conference with Jennifer Weller	0.40	\$325.00	\$130.00
2/04/2014	TNH	review rule 37 letter from JWeller	0.20	\$325.00	\$65.00
2/04/2014	TNH	e-mail to SC re supplementing discovery and sending a Rule 37 letter	0.30	\$325.00	\$97.50
2/05/2014	SC	Processed letter from d, letter to cl, conf agreements signed by block	0.20	\$125.00	\$25.00
2/05/2014	SC	conf TNH re client's verification sheet	0.10	\$125.00	\$12.50
2/05/2014	SC	Edited [REDACTED] emailed to client	0.30	\$125.00	\$37.50
2/05/2014	SC	Drafted letter to OC	0.20	\$125.00	\$25.00
2/05/2014	TNH	conf SC re client's verification sheet	0.10	\$325.00	\$32.50
2/05/2014	TNH	review draft letter to J weller	0.10	\$325.00	\$32.50
2/05/2014	TNH	work on Rule 37 letter to Weller	0.30	\$325.00	\$97.50
2/06/2014	SC	Drafted motion for disc extension	0.50	\$125.00	\$62.50

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Date	Case	Description	Hours	Rate	Amount
2/06/2014	SC	Emailed updated verification to OC	0.10	\$125.00	\$12.50
2/06/2014	SC	Edited rule 37 letter to OC	0.30	\$125.00	\$37.50
2/06/2014	SC	Processed rule 37 letter	0.10	\$125.00	\$12.50
2/06/2014	SC	Emailed rule 37 letter to oc	0.10	\$125.00	\$12.50
2/06/2014	SC	PC to client	0.20	\$125.00	\$25.00
2/06/2014	TNH	REVIEW AND SIGN LETTER TO OC	0.10	\$325.00	\$32.50
2/06/2014	TNH	REVIEW E-MAIL FROM CLIENT [REDACTED] [REDACTED]	0.10	\$325.00	\$32.50
2/07/2014	SC	Edited [REDACTED] for client	0.40	\$125.00	\$50.00
2/10/2014	SC	Conf TNH re Ms. Paxton dep date	0.20	\$125.00	\$25.00
2/10/2014	SC	Conf TNH re supplementing Ms. Paxton's discovery responses- BANKING INFORMATION	0.20	\$125.00	\$25.00
2/10/2014	SC	PC to client	0.20	\$125.00	\$25.00
2/10/2014	TNH	conf SC [REDACTED] [REDACTED]	0.20	\$325.00	\$65.00
2/10/2014	TNH	conf Rob Block re discovery	0.20	\$325.00	\$65.00
2/10/2014	TNH	conf SC re Ms. Paxton dep date	0.20	\$325.00	\$65.00
2/11/2014	DAE	Conf TNH [REDACTED] client [REDACTED] [REDACTED]	0.10	\$600.00	\$60.00
2/11/2014	SC	Conf TNH re client's [REDACTED] [REDACTED]	0.30	\$125.00	\$37.50
2/11/2014	SC	PC to client	0.10	\$125.00	\$12.50
2/11/2014	SC	Drafted [REDACTED] for client's [REDACTED] [REDACTED]	0.30	\$125.00	\$37.50
2/11/2014	SC	Edited authorization	0.10	\$125.00	\$12.50
2/11/2014	SC	Emailed client	0.10	\$125.00	\$12.50

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2/11/2014	SC	Follow up email to cl	0.10	\$125.00	\$12.50
2/11/2014	SC	Processed notice of dep	0.10	\$125.00	\$12.50
2/11/2014	TNH	e-mail from Weller re case	0.10	\$325.00	\$32.50
2/11/2014	TNH	review and edit mtn for an extension of time	0.10	\$325.00	\$32.50
2/11/2014	TNH	e-mail to J Weller re discovery- deps, extension and 2012 net worth info	0.10	\$325.00	\$32.50
2/11/2014	TNH	conf client	0.20	\$325.00	\$65.00
2/11/2014	TNH	conf SC re client's bank account information	0.30	\$325.00	\$97.50
2/11/2014	TNH	review Rule 37 letter from oc re client's supplemental discovery responses	0.20	\$325.00	\$65.00
2/11/2014	TNH	conf DAE re issue re client and enforcing discovery re def's net worth	0.10	\$325.00	\$32.50
2/12/2014	SC	Conf TNH re client records	0.10	\$125.00	\$12.50
2/12/2014	TNH	e-mail from client [REDACTED]	0.10	\$325.00	\$32.50
2/12/2014	TNH	e-mail to client [REDACTED]	0.10	\$325.00	\$32.50
2/12/2014	TNH	e-mail to JWeller re discovery issues	0.20	\$325.00	\$65.00
2/12/2014	TNH	conf SC re client records	0.10	\$325.00	\$32.50
2/13/2014	TNH	e-mail from Jennifer Weller re deps	0.10	\$325.00	\$32.50
2/14/2014	SC	Filed mtn extension, prepared courtesy copy	0.30	\$125.00	\$37.50
2/14/2014	SC	Processed mtn disc extension	0.10	\$125.00	\$12.50
2/14/2014	SC	Drafted letter to BofA requesting records	0.20	\$125.00	\$25.00
2/14/2014	SC	Conf TNH re noticing mtn for extension of discovery	0.10	\$125.00	\$12.50
2/14/2014	SC	PC from OC secretary re: dep Mon	0.10	\$125.00	\$12.50
2/14/2014	TNH	e-mail to Jennifer Weller	0.10	\$325.00	\$32.50

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2/14/2014	TNH	conf SC re noticing mtn for extension of discovery	0.10	\$325.00	\$32.50
2/14/2014	TNH	e-mail to and from J weller re discovery motion notice date	0.20	\$325.00	\$65.00
2/18/2014	DAE	Conf TNH and SC re disclosing Block as expert	0.30	\$600.00	\$180.00
2/18/2014	DAE	Conf TNH re noticing mtn for an extension of discovery	0.30	\$600.00	\$180.00
2/18/2014	DAE	Conf TNH re disclosing Block and prior report	0.20	\$600.00	\$120.00
2/18/2014	DAE	Conf TNH re scheduling deps for defendant deponents	0.30	\$600.00	\$180.00
2/18/2014	SC	Conf DAE and TNH re disclosing Block as expert	0.30	\$125.00	\$37.50
2/18/2014	SC	Looked through 24966 for expert info	0.30	\$125.00	\$37.50
2/18/2014	TNH	e-mail to Mr. Block re CV	0.10	\$325.00	\$32.50
2/18/2014	TNH	review file re pror report from Block	0.30	\$325.00	\$97.50
2/18/2014	TNH	conf DAE re disclosing Block and prior report	0.20	\$325.00	\$65.00
2/18/2014	TNH	conf DAE re scheduling deps for defendant deponents	0.30	\$325.00	\$97.50
2/18/2014	TNH	conf DAE and SC re disclosing Block as expert	0.30	\$325.00	\$97.50
2/18/2014	TNH	conf DAE re noticing mtn for an extension of discovery	0.30	\$325.00	\$97.50
2/20/2014	SC	Drafted letter to client [REDACTED]	0.20	\$125.00	\$25.00
2/20/2014	SC	Processed notice of dep of client	0.10	\$125.00	\$12.50
2/21/2014	DAE	Conf TNH re disclosure of expert	0.20	\$600.00	\$120.00
2/21/2014	JP	conf with SC then TNH about 26a2 disclosures	0.10	\$125.00	\$12.50

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2/21/2014	JP	assembling 26a2 disclosures to serve, serving disclosures by hand and email	1.10	\$125.00	\$137.50
2/21/2014	SC	Conf with JP about 26a2 disclosures	0.10	\$125.00	\$12.50
2/21/2014	TNH	Conf with JP about 26a2 disclosures	0.10	\$325.00	\$32.50
2/21/2014	TNH	conf DAE re disclosure of Expert	0.20	\$325.00	\$65.00
2/21/2014	TNH	draft expert disclosure re Block	0.30	\$325.00	\$97.50
2/24/2014	TNH	e-mail to J Weller re deps	0.10	\$325.00	\$32.50
2/25/2014	SC	Processed 26a2 disclosures, letter to client	0.10	\$125.00	\$12.50
2/26/2014	SC	Edited [REDACTED] for client	0.30	\$125.00	\$37.50
2/26/2014	SC	Emailed [REDACTED] to client	0.10	\$125.00	\$12.50
3/03/2014	SC	PC to hinshaw confirming dep	0.10	\$125.00	\$12.50
3/03/2014	SC	Redacted bank records, emailed to OC	2.30	\$125.00	\$287.50
3/03/2014	TNH	review client docs for production	0.70	\$325.00	\$227.50
3/03/2014	TNH	called J Weller	0.10	\$325.00	\$32.50
3/03/2014	TNH	conf J Weller re discovery	0.20	\$325.00	\$65.00
3/04/2014	AD	ECF	0.10	\$125.00	\$12.50
3/04/2014	DAE	conf TNH re issues at client's depo	0.10	\$600.00	\$60.00
3/04/2014	SC	Re-redacted bank accounts, went through other clients docs, redacted, bates stamped, assembled to send to OC	0.70	\$125.00	\$87.50
3/04/2014	SC	Drafted, emailed letter to OC w/docs	0.20	\$125.00	\$25.00
3/04/2014	SC	Conf w/TNH re: docs	0.20	\$125.00	\$25.00
3/04/2014	TNH	e-mails to and from DAE and CAC re tomorrow's court appearance- stricken?	0.30	\$325.00	\$97.50
3/04/2014	TNH	Conf w/SC re: docs	0.20	\$325.00	\$65.00
3/04/2014	TNH	deposition of Julia Paxton	3.20	\$325.00	\$1,040.00

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3/04/2014	TNH	conf DAE re issues at client's deposition	0.10	\$325.00	\$32.50
3/04/2014	TNH	meeting with client	3.00	\$325.00	\$975.00
3/05/2014	SC	Conf TNH renoticing deps	0.10	\$125.00	\$12.50
3/05/2014	SC	Processed ct order	0.10	\$125.00	\$12.50
3/05/2014	TNH	conf SC re renoticing deps	0.10	\$325.00	\$32.50
3/06/2014	SC	Conf TNH re dep date and availability	0.10	\$125.00	\$12.50
3/06/2014	TNH	e-mail from J Weller re new dep dates	0.10	\$325.00	\$32.50
3/06/2014	TNH	e-mail from J Weller re new dep notice	0.10	\$325.00	\$32.50
3/06/2014	TNH	conf SC re dep date and availability	0.10	\$325.00	\$32.50
3/07/2014	SC	Checked DAE/TNH schedule for dep of Ds, amended notice of deps	0.30	\$125.00	\$37.50
3/07/2014	TNH	Conf SC re third disco requests	0.20	\$325.00	\$65.00
3/10/2014	DAE	conf TNH re 2012 financials	0.20	\$600.00	\$120.00
3/10/2014	SC	conf TNH re dep notices	0.30	\$125.00	\$37.50
3/10/2014	TNH	conf DAE re 2012 financials	0.20	\$325.00	\$65.00
3/10/2014	TNH	conf SC re dep notices	0.30	\$325.00	\$97.50
3/10/2014	TNH	e-mail from J Weller re dep start time	0.10	\$325.00	\$32.50
3/10/2014	TNH	e-mail to and from J weller re financial statements	0.20	\$325.00	\$65.00
3/10/2014	TNH	e-mail financial statements oto Mr. Block	0.10	\$325.00	\$32.50
3/11/2014	DAE	conf TNH re location and time of Paxton Deps	0.40	\$600.00	\$240.00
3/11/2014	SC	Edited amended notice of dep	0.20	\$125.00	\$25.00
3/11/2014	TNH	conf DAE re location and time of Paxton Deps	0.40	\$325.00	\$130.00
3/12/2014	DAE	Emails to TNH re telephonic dep	0.20	\$600.00	\$120.00

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3/12/2014	DAE	Conf TNH re dep limitations	0.30	\$600.00	\$180.00
3/12/2014	DAE	Conf TNH re dep dates and time	0.20	\$600.00	\$120.00
3/12/2014	SC	Conf TNH re dep notice	0.20	\$125.00	\$25.00
3/12/2014	TNH	conf J Weller re deps	0.30	\$325.00	\$97.50
3/12/2014	TNH	e-mail to and from J weller re deps	0.20	\$325.00	\$65.00
3/12/2014	TNH	conf DAE re dep dates and time	0.20	\$325.00	\$65.00
3/12/2014	TNH	e-mail to and from DAE re deps telephonic	0.10	\$325.00	\$32.50
3/12/2014	TNH	conf DAE dep dep limitations	0.30	\$325.00	\$97.50
3/12/2014	TNH	conf SC re dep notice	0.20	\$325.00	\$65.00
3/12/2014	TNH	review file re dep scope	0.40	\$325.00	\$130.00
3/13/2014	DAE	conf TNH re deps	0.30	\$600.00	\$180.00
3/13/2014	TNH	conf DAE re deps	0.30	\$325.00	\$97.50
3/13/2014	TNH	e-mail to RB (expert) re Huston dep	0.10	\$325.00	\$32.50
3/14/2014	AD	ECF	0.10	\$125.00	\$12.50
3/14/2014	CMC	Conf DAE and TNH re disco requests/responses	0.50	\$600.00	\$300.00
3/14/2014	DAE	conf TNH and CMC re disco requests/responses	0.50	\$600.00	\$300.00
3/14/2014	DAE	review and revise motion to compel	1.00	\$600.00	\$600.00
3/14/2014	TNH	conf DAE and CMC re discovery requests/ responses	0.50	\$325.00	\$162.50
3/14/2014	TNH	edit and revise mtn to compel	0.30	\$325.00	\$97.50
3/14/2014	TNH	called J Weller (2x) left vm message	0.10	\$325.00	\$32.50
3/14/2014	TNH	call with Dave Schultz re discovery responses	0.10	\$325.00	\$32.50
3/14/2014	TNH	edit and revise amended mtn to compel	0.30	\$325.00	\$97.50

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3/14/2014	TNH	draft Rule 37 letter to Weller	0.30	\$325.00	\$97.50
3/14/2014	TNH	e-mail letter to Weller	0.10	\$325.00	\$32.50
3/16/2014	DAE	prepare for deps	4.00	\$600.00	\$2,400.00
3/17/2014	CMC	Conf DAE and TNH re block present during dep	0.40	\$600.00	\$240.00
3/17/2014	DAE	conf TNH re dep and time	0.30	\$600.00	\$180.00
3/17/2014	DAE	Conf TNH and CMC re Block present during dep	0.40	\$600.00	\$240.00
3/17/2014	DAE	conf TNH re Rule 37 letter	0.30	\$600.00	\$180.00
3/17/2014	DAE	conf TNH re disco and docs needed for deps	0.30	\$600.00	\$180.00
3/17/2014	DAE	Conf TNH re supp disco requests	0.50	\$600.00	\$300.00
3/17/2014	DAE	prepare for deps	4.00	\$600.00	\$2,400.00
3/17/2014	SC	Conf w/TNH re: 3rd disc requests	0.20	\$125.00	\$25.00
3/17/2014	SC	Prroessed dep notices, court reporter confirmations, disc requests, mtns	0.30	\$125.00	\$37.50
3/17/2014	SC	Edited 3rd disc requests, emailed/mailed to OC	0.30	\$125.00	\$37.50
3/17/2014	SC	Filed amended notice of motion	0.10	\$125.00	\$12.50
3/17/2014	SC	Conf TNH re revisions to second set of disco	0.30	\$125.00	\$37.50
3/17/2014	SC	Drafted 2nd, 3rd disc requests, 2nd amended re-notice of deps, hand delivered 2nd disc requests and dep notice to OC	1.80	\$125.00	\$225.00
3/17/2014	TNH	draft Rule 37 letter	0.40	\$325.00	\$130.00
3/17/2014	TNH	conf DAE reRule 37 letter	0.30	\$325.00	\$97.50
3/17/2014	TNH	edit and revise letter as per DAE	0.30	\$325.00	\$97.50
3/17/2014	TNH	e-mails from DAE re Paxton	0.30	\$325.00	\$97.50

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3/17/2014	TNH	conf DAE re supplemental discovery requests	0.50	\$325.00	\$162.50
3/17/2014	TNH	conf SC re revisions to second set of discovery	0.30	\$325.00	\$97.50
3/17/2014	TNH	conf J Weller re dep end time	0.30	\$325.00	\$97.50
3/17/2014	TNH	conf DAE re dep end time	0.30	\$325.00	\$97.50
3/17/2014	TNH	conf DAE and CMC re Block present during dep	0.40	\$325.00	\$130.00
3/17/2014	TNH	e-mail to Rob Block re talking tomorrow re def's financials and dep	0.10	\$325.00	\$32.50
3/17/2014	TNH	conf J Weller re incomplete records	0.10	\$325.00	\$32.50
3/17/2014	TNH	call from Court re erroneous notice of mtn	0.10	\$325.00	\$32.50
3/17/2014	TNH	conf DAE re discovery and docs needed for dep	0.30	\$325.00	\$97.50
3/18/2014	CMC	conf w DAE & TLG; t/c Schultz re: disc and depts	1.00	\$600.00	\$600.00
3/18/2014	CMC	conf TNH and DAE re case	0.30	\$600.00	\$180.00
3/18/2014	CMC	Conf DAE and TNH	0.40	\$600.00	\$240.00
3/18/2014	CMC	Joint call with TNH and DAE to J Weller and D Schultz	0.40	\$600.00	\$240.00
3/18/2014	CMC	conf TNH re email from J Weller	0.30	\$600.00	\$180.00
3/18/2014	DAE	Conf with CMC and TLG; t/c Schultz	1.00	\$600.00	\$600.00
3/18/2014	DAE	conf call with Rob Block and TNH	0.60	\$600.00	\$360.00
3/18/2014	DAE	Conf TNH had CMC re case	0.30	\$600.00	\$180.00
3/18/2014	DAE	prepare for depts, t/c opp counsel	3.00	\$600.00	\$1,800.00
3/18/2014	DAE	Conf TNH and CMC	0.40	\$600.00	\$240.00
3/18/2014	DAE	Joint call with TNH and CMC to J Weller and D Schultz	0.40	\$600.00	\$240.00

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3/18/2014	SC	PC from barkley to confirm deps	0.10	\$125.00	\$12.50
3/18/2014	SC	Scanned in exhibits from Jones v. NCA dep of Husfon to send to Weller	0.40	\$125.00	\$50.00
3/18/2014	SC	Scanned in DAE exhibits for dep of Gylling et al	0.40	\$125.00	\$50.00
3/18/2014	SC	Processed letters to/from OC	0.10	\$125.00	\$12.50
3/18/2014	TLG	conf with DAE and CMC; t/c with Schultz	1.00	\$550.00	\$550.00
3/18/2014	TNH	conf CMC re e-mail from J Weller	0.30	\$325.00	\$97.50
3/18/2014	TNH	conf DAE and CMC	0.40	\$325.00	\$130.00
3/18/2014	TNH	joint call to J Weller and CMC	0.10	\$325.00	\$32.50
3/18/2014	TNH	joint call with DAE and CMC to JWeller and DSchultz	0.40	\$325.00	\$130.00
3/18/2014	TNH	minute order re tomorrow's appearance stricken	0.10	\$325.00	\$32.50
3/18/2014	TNH	conference call with Rob Block and DAE	0.60	\$325.00	\$195.00
3/18/2014	TNH	conf DAE and CMC re case	0.30	\$325.00	\$97.50
3/18/2014	TNH	e-mail from J Weller	0.20	\$325.00	\$65.00
3/19/2014	DAE	deposition and preparation	4.00	\$600.00	\$2,400.00
3/19/2014	DAE	conf TNH re docs and Payday Loan	0.30	\$600.00	\$180.00
3/19/2014	JM	ecf	0.10	\$125.00	\$12.50
3/19/2014	SC	Prepared exhibits for dep, sent to court reporter, OC multiple times, PCs to court reporters, emails to/from court reporters, drafted dep notice, doc request	2.20	\$125.00	\$275.00
3/19/2014	TNH	conf J Weller re issues re court report and contact at law firm for deposition	0.30	\$325.00	\$97.50
3/19/2014	TNH	check e-mails re other Loan docs (re Payday Loans)	0.40	\$325.00	\$130.00

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3/19/2014	TNH	sat in on Gylling dep	3.00	\$325.00	\$975.00
3/19/2014	TNH	conf DAE re docs and Payday Loan yes	0.30	\$325.00	\$97.50
3/19/2014	TNH	e-mail from Jennifer Weller re attachment	0.10	\$325.00	\$32.50
3/20/2014	CMC	work n sett docs	0.10	\$600.00	\$60.00
3/20/2014	DAE	Conf TNH re dep notices and additional doc requests	0.30	\$600.00	\$180.00
3/20/2014	DAE	depositions (2) and preparation	4.00	\$600.00	\$2,400.00
3/20/2014	SC	Conf TNH re serving dep notices and additional doc requests	0.30	\$125.00	\$37.50
3/20/2014	TNH	conf SC re serving dep notices and additional doc requests	0.30	\$325.00	\$97.50
3/20/2014	TNH	depositions	4.50	\$325.00	\$1,462.50
3/20/2014	TNH	conf DAE re dep notices and additional doc requests	0.30	\$325.00	\$97.50
3/21/2014	SA	hand delivery discovery to Hinshaw	0.50	\$125.00	\$62.50
3/21/2014	SC	Drafted amended dep notice, sent to oc	0.30	\$125.00	\$37.50
3/21/2014	SC	conf TNH re noticing deps	0.20	\$125.00	\$25.00
3/21/2014	TNH	edit and revise notes from the Huston Deposition	0.40	\$325.00	\$130.00
3/21/2014	TNH	conf SC re noticing deps	0.20	\$325.00	\$65.00
3/21/2014	TNH	research identiy of deponent "Vicky"	0.20	\$325.00	\$65.00
3/24/2014	SC	Emailed exhibits from dep to dae	0.20	\$125.00	\$25.00
3/24/2014	SC	Processed disc requests, dep notices	0.20	\$125.00	\$25.00
3/24/2014	TS	Saved 1 ECF file	0.10	\$125.00	\$12.50
3/25/2014	DAE	send FOIA requests for loan documents to various agencies	2.00	\$600.00	\$1,200.00

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3/25/2014	SC	Processed ct order, letter	0.10	\$125.00	\$12.50
3/26/2014	CMC	work on resp to 6th aff def	0.30	\$600.00	\$180.00
3/26/2014	DAE	conf TNH in prep formtn hearing	0.40	\$600.00	\$240.00
3/26/2014	DAE	motion hearing	1.00	\$600.00	\$600.00
3/26/2014	DAE	prepare response to aff defense 6	4.00	\$600.00	\$2,400.00
3/26/2014	SC	Searched D's doc production for form letter for DAE	0.20	\$125.00	\$25.00
3/26/2014	SC	Printed docs for court for dae	0.20	\$125.00	\$25.00
3/26/2014	TNH	conf DAE in preparation for mtn hearing	0.40	\$325.00	\$130.00
3/26/2014	TNH	Pl's third mtn for class cert/D's mtn to amend aff defs/P's mtn to compel disc	1.00	\$325.00	\$325.00
3/26/2014	TNH	prep for mtn hearings	0.50	\$325.00	\$162.50
3/27/2014	DAE	email TNH re one way intervention	0.10	\$600.00	\$60.00
3/27/2014	DAE	prepare response to 6th aff def and s/j based thereon	7.00	\$600.00	\$4,200.00
3/27/2014	DAE	read TNH email re ordering transcript; respond to same	0.10	\$700.00	\$70.00
3/27/2014	DAE	Read email from TNH re conv with J Weller	0.10	\$600.00	\$60.00
3/27/2014	SC	Ordered transcript of mtn hearing	0.20	\$125.00	\$25.00
3/27/2014	SC	Conf TNH re ordering transcript of mtn hearing	0.30	\$125.00	\$37.50
3/27/2014	SC	read email from TNH re ordering transcript of mtn hearing; respond to same	0.20	\$125.00	\$25.00
3/27/2014	TNH	conf SC re ordering transcript of mtn hearing	0.30	\$325.00	\$97.50
3/27/2014	TNH	e-mail to and from SC re ordering transcript of mtn hearing	0.20	\$325.00	\$65.00
3/27/2014	TNH	e-mail from DAE re one-way intervention	0.10	\$325.00	\$32.50

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3/27/2014	TNH	conf J Weller re one-way intervention	0.20	\$325.00	\$65.00
3/27/2014	TNH	e-mail to DAE re conv with J Weller	0.10	\$325.00	\$32.50
3/27/2014	TNH	review court order	0.20	\$325.00	\$65.00
3/27/2014	TNH	e-mail to and from DAE re ordering transcript	0.10	\$325.00	\$32.50
3/27/2014	TS	Saved 1 ECF file	0.10	\$125.00	\$12.50
3/28/2014	CMC	work on mot sj 6th aff def	0.50	\$600.00	\$300.00
3/28/2014	SC	Read email from TNH re J Weller Response re one way intervention issue	0.10	\$125.00	\$12.50
3/28/2014	SC	Proofread mtn re: one way intervention, prepared for filing	0.40	\$125.00	\$50.00
3/28/2014	SC	Filed mtn re: one way intervention, prepared courtesy copy	0.30	\$125.00	\$37.50
3/28/2014	SC	PCs to/from TNH re: communication from Weller	0.20	\$125.00	\$25.00
3/28/2014	SC	Prepared exhibits to response to 6th aff defense, redacted	1.50	\$125.00	\$187.50
3/28/2014	SC	Looked up lenders in IL dept of financial and prof regulation website, drafted affidavit	0.60	\$125.00	\$75.00
3/28/2014	SC	Drafted 5th discovery requests, hand delivered to OC	0.80	\$125.00	\$100.00
3/28/2014	TNH	call from SC re heard from J Weller	0.20	\$325.00	\$65.00
3/28/2014	TNH	e-mail to SC re J Weller response (none) re one-way intervention issue	0.10	\$325.00	\$32.50
3/28/2014	TS	Saved 1 ECF file	0.10	\$125.00	\$12.50
3/29/2014	DAE	work on s/j papers	3.00	\$600.00	\$1,800.00
3/31/2014	SC	Edited SMF, assembled exhibits, redacted exhibits	2.80	\$125.00	\$350.00

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3/31/2014	SC	Assembled exhibits to SMF, redaction, (more), drafted declaration of dae	0.50	\$125.00	\$62.50
4/01/2014	CMC	conf TNH and DAE re motion hearing tomorrow	0.50	\$600.00	\$300.00
4/01/2014	DAE	conf CMC and TNH re mtn hearing tomorrow	0.50	\$600.00	\$300.00
4/01/2014	DAE	read email from TNH re voicemail message from J Weller; respond to same	0.20	\$600.00	\$120.00
4/01/2014	DAE	read TNH email re def's request for dep originals	0.10	\$600.00	\$60.00
4/01/2014	DAE	Conf TNH re def's request re original dep transcripts	0.10	\$600.00	\$60.00
4/01/2014	SC	conf TNH re redactions and confidential info	0.20	\$125.00	\$25.00
4/01/2014	SC	Futher redacted and proofed exhibits to R 56.1 statement and response to 6th aff defense	1.40	\$125.00	\$175.00
4/01/2014	SC	Prepared response to 6th aff defense for filing	0.40	\$125.00	\$50.00
4/01/2014	SC	Filed response to 6th aff defense, prepared courtesy copy (bound) for judge	0.60	\$125.00	\$75.00
4/01/2014	SC	Edited declaration of DAE	0.40	\$125.00	\$50.00
4/01/2014	SC	Drafted updated dep notice, mailed, emailed to OC, sent to court reporter	0.30	\$125.00	\$37.50
4/01/2014	TNH	conf DAE & CMC re mtn hearing tomorrow	0.50	\$325.00	\$162.50
4/01/2014	TNH	voicemail message from J Weller	0.10	\$325.00	\$32.50
4/01/2014	TNH	e-mail to and from DAE re voicemail message room J Weller	0.20	\$325.00	\$65.00
4/01/2014	TNH	Conf SC re redactions and confidential info	0.20	\$325.00	\$65.00
4/01/2014	TNH	Email from OC re sending orig. dep transcript to deponents	0.10	\$325.00	\$32.50

4/01/2014	TNH	Email DAE re def's request for dep originals	0.10	\$325.00	\$32.50
4/01/2014	TNH	conf dae re def's request re original dep transcripts	0.10	\$325.00	\$32.50
4/01/2014	TNH	e-mail from J Weller re deps	0.10	\$325.00	\$32.50
4/01/2014	TNH	review response to be filed today	0.30	\$325.00	\$97.50
4/02/2014	DAE	appear on motion re one way intervention	1.00	\$600.00	\$600.00
4/02/2014	DAE	conf TNH re deps	0.10	\$600.00	\$60.00
4/02/2014	DAE	Email TNH re Block's report	0.10	\$600.00	\$60.00
4/02/2014	DAE	conf TNH re requesting timeframe for expert report	0.10	\$600.00	\$60.00
4/02/2014	SC	Processed letters re: freedom of information act	0.10	\$125.00	\$12.50
4/02/2014	TNH	conf DAE re deps	0.10	\$325.00	\$32.50
4/02/2014	TNH	P's mtn to require D to state whether it waives any objection based on 1-way intervention	1.00	\$325.00	\$325.00
4/02/2014	TNH	e-mail from DAE re Blocks report	0.10	\$325.00	\$32.50
4/02/2014	TNH	conf DAE re requesting timeframe for expert report	0.10	\$325.00	\$32.50
4/02/2014	TNH	e-mail to and from Mr. Block re status of report	0.30	\$325.00	\$97.50
4/03/2014	CMC	conf DAE and TNH re traveling to Milwaukee for deps	0.20	\$600.00	\$120.00
4/03/2014	DAE	read/resp to TNH emails re deps in Milwaukee	0.20	\$600.00	\$120.00
4/03/2014	DAE	conf TNH and CMC re traveling to Milwaukee for deps	0.20	\$600.00	\$120.00
4/03/2014	SC	conf SC re noticing deps (2nd time)	0.10	\$125.00	\$12.50

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4/03/2014	SC	conf TNH re renoticing deps	0.10	\$125.00	\$12.50
4/03/2014	SC	Prepared exhibits for DAE for dep	0.30	\$125.00	\$37.50
4/03/2014	SC	Emailed/mailed amended dep notice to OC, emailed to court reporter, emailed protective order to court reporter	0.40	\$125.00	\$50.00
4/03/2014	SC	Drafted amended dep notice	0.20	\$125.00	\$25.00
4/03/2014	TNH	e-mail from J weller re deps in Milwaukee (2x)	0.20	\$325.00	\$65.00
4/03/2014	TNH	conf SC re renoticing deps	0.10	\$325.00	\$32.50
4/03/2014	TNH	e-mails to and from DAE re deps in Milwaukee	0.20	\$325.00	\$65.00
4/03/2014	TNH	conf DAE and CMC re traveling to Milwaukee for deps	0.20	\$325.00	\$65.00
4/03/2014	TNH	conf SC re re noticing deps (2nd time)	0.10	\$325.00	\$32.50
4/03/2014	TS	Saved 1 ECF file	0.10	\$125.00	\$12.50
4/04/2014	JM	ecf	0.10	\$125.00	\$12.50
4/07/2014	DAE	read/resp to TNH email re availability for dep	0.10	\$600.00	\$60.00
4/07/2014	SC	Emailed dep transcript to block, drafted letter, put files on CD, mailed to block	0.40	\$125.00	\$50.00
4/07/2014	SC	PC from barkley re: confirmation of dep	0.10	\$125.00	\$12.50
4/07/2014	SC	emailed barkley re: exhibits to dep	0.10	\$125.00	\$12.50
4/07/2014	SC	Processed court orders, transcript, signed pro order	0.20	\$125.00	\$25.00
4/07/2014	TNH	e-mail from Robert Block re availability for dep	0.10	\$325.00	\$32.50
4/07/2014	TNH	e-mail to and from DAE re availability for dep	0.10	\$325.00	\$32.50
4/07/2014	TNH	e-mail to and from J Weller re dep exhibits	0.10	\$325.00	\$32.50
4/08/2014	DAE	deposition and preparation	4.00	\$600.00	\$2,400.00

4/08/2014	SC	Emailed exhibit 11 to court reporter, oc, dae, emaild barkely about other missing exhibits	0.30	\$125.00	\$37.50
4/08/2014	SC	Printed docs for DAE for dep	0.20	\$125.00	\$25.00
4/08/2014	TNH	deposition for Lori	1.40	\$325.00	\$455.00
4/09/2014	DAE	conf TNH re sj exhibits	0.10	\$600.00	\$60.00
4/09/2014	JOL	conf TNH re sj brief	0.10	\$600.00	\$60.00
4/09/2014	SC	conf TNH re sj exhibits	0.10	\$125.00	\$12.50
4/09/2014	SC	Made redwalls of DAE notes re: summary judgment motions	0.30	\$125.00	\$37.50
4/09/2014	SC	Made redwall of original transcripts	0.20	\$125.00	\$25.00
4/09/2014	TNH	conf JOL re sj brief	0.10	\$325.00	\$32.50
4/09/2014	TNH	conf DAE re sj exhibits	0.10	\$325.00	\$32.50
4/09/2014	TNH	conf SC re sj exhibits	0.10	\$325.00	\$32.50
4/10/2014	SC	conf TNH re sending amended complaint to Block	0.20	\$125.00	\$25.00
4/10/2014	SC	Emailed complaint to block	0.10	\$125.00	\$12.50
4/10/2014	TNH	Email Block re complaint	0.10	\$325.00	\$32.50
4/10/2014	TNH	CONF SC RE SENDING AMENDED COMPLAINT TO ROB BLOCK	0.20	\$325.00	\$65.00
4/11/2014	DAE	conf TNH re Block's expert	0.40	\$600.00	\$240.00
4/11/2014	TNH	conf DAE re Mr. Block's expert report	0.40	\$325.00	\$130.00
4/14/2014	CMC	expert report	0.50	\$600.00	\$300.00
4/14/2014	DAE	conf TNH re expert report	0.30	\$600.00	\$180.00
4/14/2014	SC	Processed expert report	0.10	\$125.00	\$12.50
4/14/2014	TNH	copy report for CMC and CL	0.30	\$325.00	\$97.50
4/14/2014	TNH	e-mail from [REDACTED]	0.10	\$325.00	\$32.50

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4/14/2014	TNH	conf DAE [REDACTED]	0.30	\$325.00	\$97.50
4/15/2014	DAE	conf TNH [REDACTED]	0.30	\$600.00	\$180.00
4/15/2014	SC	conf TNH [REDACTED] [REDACTED]	0.30	\$125.00	\$37.50
4/15/2014	TNH	conf J Weller re exhibits and protective Order	0.20	\$325.00	\$65.00
4/15/2014	TNH	review expert report and Rule 26	0.50	\$325.00	\$162.50
4/15/2014	TNH	conf DAE re Block report & Rule 26	0.30	\$325.00	\$97.50
4/15/2014	TNH	conf SC re report- compensation and scan and e-mail	0.30	\$325.00	\$97.50
4/15/2014	TNH	e-mail Mr. Block re report	0.10	\$325.00	\$32.50
4/16/2014	DAE	conf TNH re expert disco schedule	0.10	\$600.00	\$60.00
4/16/2014	DAE	conf TNH re questions from Block	0.10	\$600.00	\$60.00
4/16/2014	SC	Emailed TNH re: PC from Block	0.10	\$125.00	\$12.50
4/16/2014	TNH	conf DAE re questions from Block	0.10	\$325.00	\$32.50
4/16/2014	TNH	e-mail to Weller re agreement re expert schedule	0.10	\$325.00	\$32.50
4/16/2014	TNH	e-mail to Block re deposition and report	0.20	\$325.00	\$65.00
4/16/2014	TNH	conf [REDACTED]	0.40	\$325.00	\$130.00
4/16/2014	TNH	e-mail to J Weller re deposing expert Block	0.10	\$325.00	\$32.50
4/16/2014	TNH	e-mail from Jweller re proposing expert discovery schedule	0.10	\$325.00	\$32.50
4/16/2014	TNH	conf DAE re expert discovery schedule	0.10	\$325.00	\$32.50
4/21/2014	CMC	disc	0.20	\$600.00	\$120.00
4/21/2014	DAE	conf TNH re Def's request for 2 day extension	0.20	\$600.00	\$120.00
4/21/2014	DAE	conf TNH re discovery	0.40	\$600.00	\$240.00

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4/21/2014	SC	PCs from OC	0.20	\$125.00	\$25.00
4/21/2014	TNH	conf DAE re expert discovery schedule	0.40	\$325.00	\$130.00
4/21/2014	TNH	e-mail to and from Mr. Block re report and def's expert witness	0.20	\$325.00	\$65.00
4/21/2014	TNH	e-mail from J Weller re discovery responses	0.10	\$325.00	\$32.50
4/21/2014	TNH	conf DAE re Def's request for 2 day extension	0.20	\$325.00	\$65.00
4/21/2014	TNH	conf J Weller re discovery responses	0.20	\$325.00	\$65.00
4/21/2014	TNH	e-mail from and to JWeller re joint mtn for expert schedule	0.20	\$325.00	\$65.00
4/21/2014	TNH	review mtn re expert discovery	0.20	\$325.00	\$65.00
4/22/2014	CMC	motion to compel	1.00	\$600.00	\$600.00
4/22/2014	CMC	work on mot to compel	0.50	\$600.00	\$300.00
4/22/2014	CMC	conf DAE and TNH re revisions to mtn to compel	0.30	\$600.00	\$180.00
4/22/2014	CMC	Conf DAE and TNH re disco	0.50	\$600.00	\$300.00
4/22/2014	CMC	conf DAE and TNH re report	0.30	\$600.00	\$180.00
4/22/2014	CMC	conf DAE and TNH re rule 37 conference and mtn to compel	0.30	\$600.00	\$180.00
4/22/2014	DAE	conf CMC and TNH re report	0.30	\$600.00	\$180.00
4/22/2014	DAE	conf CMC and TNH re rule 37 conf. and mtn to compel	0.30	\$600.00	\$180.00
4/22/2014	DAE	conf CMC and TNH re revisions to mtn to compel	0.30	\$600.00	\$180.00
4/22/2014	DAE	conf TNH and CMC re disco	0.50	\$600.00	\$300.00
4/22/2014	JM	ecf	0.20	\$125.00	\$25.00
4/22/2014	JM	ecf	0.10	\$125.00	\$12.50

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4/22/2014	SC	Looked up terms used in disc requests in D's disc responses, printed for TNH	0.20	\$125.00	\$25.00
4/22/2014	SC	Typed more disc requests/responses to mtn to compel	0.40	\$125.00	\$50.00
4/22/2014	SC	Proof-read, edited mtn to compel, looked up local rules re: filing under seal	0.50	\$125.00	\$62.50
4/22/2014	SC	Typed disc requests/responses into mtn to compel	0.30	\$125.00	\$37.50
4/22/2014	TNH	conf J Weller re discovery responses	0.20	\$325.00	\$65.00
4/22/2014	TNH	conf DAE and CMC re discovery	0.50	\$325.00	\$162.50
4/22/2014	TNH	conf Robert Block re report	0.20	\$325.00	\$65.00
4/22/2014	TNH	conf DAE & CMC re report	0.30	\$325.00	\$97.50
4/22/2014	TNH	conf DAE and CMC re rule 37 conference and mtn to compel	0.30	\$325.00	\$97.50
4/22/2014	TNH	e-mail from Robert BLock	0.20	\$325.00	\$65.00
4/22/2014	TNH	DRAFT MTN TO COMPEL/ EDIT AND REVISE MTN TO COMPEL	4.20	\$325.00	\$1,365.00
4/22/2014	TNH	Conf CMC and DAE re revisions to mtn to compel	0.30	\$325.00	\$97.50
4/23/2014	CMC	conf DAE and TNH re def's resp to 4th disco request	0.40	\$600.00	\$240.00
4/23/2014	CMC	work on mot to compel	1.00	\$600.00	\$600.00
4/23/2014	DAE	conf TNH and CMC re def's resp to 4th disco request	0.40	\$600.00	\$240.00
4/23/2014	DAE	revise motion to compel	2.00	\$600.00	\$1,200.00
4/23/2014	FRG	conf. TNH re: filing motion to compel under seal	0.20	\$480.00	\$96.00
4/23/2014	SC	conf TNH re mtn to compel and exhibits	0.40	\$125.00	\$50.00
4/23/2014	TNH	work on mtn to compel (3rd)	1.40	\$325.00	\$455.00

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4/23/2014	TNH	e-mail to client [REDACTED]	0.20	\$325.00	\$65.00
4/23/2014	TNH	Conf DAE and CMC re def's responses to 4th discovery request	0.40	\$325.00	\$130.00
4/23/2014	TNH	e-mail to J Weller re Rule 37 conference	0.10	\$325.00	\$32.50
4/23/2014	TNH	conf FRG re rules for filing under seal	0.30	\$325.00	\$97.50
4/23/2014	TNH	review exhibits re mtn to compel and redacting	0.60	\$325.00	\$195.00
4/23/2014	TNH	conf SC re mtn to compel and exhibits	0.40	\$325.00	\$130.00
4/23/2014	TNH	review def's responses to 4th discovery requests	0.40	\$325.00	\$130.00
4/24/2014	CMC	conf DAE and TNH re disco responses and rule 37 conf	1.00	\$600.00	\$600.00
4/24/2014	CMC	conf call with DAE, TNH and J Weller	0.40	\$600.00	\$240.00
4/24/2014	CMC	rev disc; t/c JWeller	1.20	\$600.00	\$720.00
4/24/2014	DAE	conf TNH and CMC re disco responses and rule 37 conf.	1.00	\$600.00	\$600.00
4/24/2014	DAE	conf call with TNH, CMC, and J Weller	0.40	\$600.00	\$240.00
4/24/2014	SC	Printed dep transcripts for TNH, DAE	0.20	\$125.00	\$25.00
4/24/2014	TNH	conf DAE and CMC re discovery responses and Rule 37 conf	1.00	\$325.00	\$325.00
4/24/2014	TNH	conference call with J weller CMC and DAE	0.40	\$325.00	\$130.00
4/24/2014	TNH	work on MTN to Compel	3.40	\$325.00	\$1,105.00
4/25/2014	CMC	work on mot to compel	0.30	\$600.00	\$180.00
4/25/2014	CMC	work on mot to compel	0.80	\$600.00	\$480.00
4/25/2014	DAE	work on 2nd motion to compel	2.00	\$600.00	\$1,200.00
4/25/2014	TNH	edit and revise mtn to compel	0.50	\$325.00	\$162.50
4/28/2014	SC	Processed mtns to compel, d's disc requests	0.20	\$125.00	\$25.00

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4/28/2014	TNH	e-mail to and from J Weller re mtns to compel	0.20	\$325.00	\$65.00
4/29/2014	CMC	conf DAE and TNH re tomorrow's ct app	0.20	\$600.00	\$120.00
4/29/2014	DAE	conf TNH and CMC re tomorrow's ct app	0.20	\$600.00	\$120.00
4/29/2014	TNH	conf DAE and CMC re tomorrow's court app	0.20	\$325.00	\$65.00
4/30/2014	CMC	attend at mot	1.20	\$600.00	\$720.00
4/30/2014	DAE	court appearance on motions to compel	1.20	\$600.00	\$720.00
4/30/2014	DAE	conf TNH re filing redacted mtn to compel	0.20	\$600.00	\$120.00
4/30/2014	DAE	email TNH re what Block reviewed	0.10	\$600.00	\$60.00
4/30/2014	SC	conf TNH re filing initial version of mtn to compel	0.10	\$125.00	\$12.50
4/30/2014	SC	conf TNH re sending draft ment of Weller	0.10	\$125.00	\$12.50
4/30/2014	SC	Printed docs for TNH/DAE for court	0.30	\$125.00	\$37.50
4/30/2014	SC	Processed d's discovery responses	0.10	\$125.00	\$12.50
4/30/2014	SC	Emailed court reporter re: hess dep transcript	0.10	\$125.00	\$12.50
4/30/2014	TNH	conf DAE re filing redacted mtn to compel	0.20	\$325.00	\$65.00
4/30/2014	TNH	conf SC re filing initial version of mtn to compel	0.10	\$325.00	\$32.50
4/30/2014	TNH	conf SC re sending draft ment of weller	0.10	\$325.00	\$32.50
4/30/2014	TNH	e-mail from DAE re what Block reviewed	0.10	\$325.00	\$32.50
5/01/2014	DAE	email TNH re Block and Jones	0.00	\$600.00	\$0.00
5/01/2014	DAE	conf TNH re questions for Mr. Block	0.10	\$600.00	\$60.00
5/01/2014	JM	ecf	0.10	\$125.00	\$12.50

5/01/2014	SC	Emailed redacted mtn to compel to OC	0.30	\$125.00	\$37.50
5/01/2014	TNH	conf Rob Block re Jones v: NCA- what did he consider	0.20	\$325.00	\$65.00
5/01/2014	TNH	called Rob Block re report and Jones- left vm message	0.10	\$325.00	\$32.50
5/01/2014	TNH	e-mail from DAE re Rob Block and Jones	0.10	\$325.00	\$32.50
5/01/2014	TNH	conf DAE re questions for Mr. Block	0.10	\$325.00	\$32.50
5/01/2014	TNH	voice mail message from Rob Block	0.10	\$325.00	\$32.50
5/01/2014	TNH	conf DAE re waiting for Weller re redacted docs	0.10	\$325.00	\$32.50
5/01/2014	TNH	e-mail order re expert schedule to Rob Block	0.10	\$325.00	\$32.50
5/02/2014	SC	Processed ct order, dep of hess	0.10	\$125.00	\$12.50
5/02/2014	SC	Printed dep transcript of hess for tn timer, dae	0.20	\$125.00	\$25.00
5/05/2014	AD	ecf	0.10	\$125.00	\$12.50
5/06/2014	SC	Processed court order	0.10	\$125.00	\$12.50
5/07/2014	SC	Drafted 26a2 disclosure, emailed/mailed to OC	0.30	\$125.00	\$37.50
5/07/2014	SC	Processed expert report	0.10	\$125.00	\$12.50
5/07/2014	TNH	e-mail from J Weller re status of redacted mtn	0.10	\$325.00	\$32.50
5/09/2014	SC	Redacted motion to compel w/d's change, sent to OC	0.30	\$125.00	\$37.50
5/12/2014	CMC	conf TNH and DAE re FOIA request - disclosure after disco closes	0.30	\$600.00	\$180.00
5/12/2014	CMC	conf DAE, JOL, and TNH re status on Wed and Weller response	0.00	\$600.00	\$0.00
5/12/2014	DAE	conf TNH, CMC, JOL re status on Wed and Weller response	0.30	\$600.00	\$180.00

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5/12/2014	DAE	Email TNH re status on Wed	0.20	\$600.00	\$120.00
5/12/2014	DAE	email TNH re FOIA request	0.10	\$600.00	\$60.00
5/12/2014	DAE	conf TNH and CMC re FOIA Request-disclosure after disco closes	0.30	\$600.00	\$180.00
5/12/2014	JOL	conf TNH, CMC, and DAE re status on Wed and Weller response	0.30	\$600.00	\$180.00
5/12/2014	JOL	Email TNH re status on Wed	0.10	\$600.00	\$60.00
5/12/2014	TNH	e-mails from DAE re status on Wednesday	0.20	\$325.00	\$65.00
5/12/2014	TNH	e-mail to J Weller re supplementing discovery	0.10	\$325.00	\$32.50
5/12/2014	TNH	e-mail from DAE re FOIA request	0.10	\$325.00	\$32.50
5/12/2014	TNH	conf DAE and CMC re FOIA Request-disclosure after discovery closes	0.30	\$325.00	\$97.50
5/12/2014	TNH	e-mail from JOL re status on Wed	0.10	\$325.00	\$32.50
5/12/2014	TNH	conf DAE, CMC and JOL re status on Wednesday and Weller response	0.30	\$325.00	\$97.50
5/12/2014	TNH	e-mail to JWeller re status of mtn	0.10	\$325.00	\$32.50
5/13/2014	DAE	conf JOL and TNH re outstanding disco	0.20	\$600.00	\$120.00
5/13/2014	DAE	conf TNH re docs ot serve re disco	0.30	\$600.00	\$180.00
5/13/2014	DAE	conf JOL and TNH re case and mtns to compel	0.50	\$600.00	\$300.00
5/13/2014	JOL	Conf DAE and TNH re case and mtns to compel	0.50	\$600.00	\$300.00
5/13/2014	JOL	conf TNH and DAE re outstanding disco	0.20	\$600.00	\$120.00
5/13/2014	SC	conf TNH re servign doc proudction	0.40	\$125.00	\$50.00
5/13/2014	SC	Prepared, filed mtn to compel (redacted)	0.30	\$125.00	\$37.50
5/13/2014	TNH	conf JOL and DAE re outstanding discovery	0.20	\$325.00	\$65.00

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5/13/2014	TNH	Conf JOL and DAE re case and mtgs to compel	0.50	\$325.00	\$162.50
5/13/2014	TNH	e-mail from J Weller re docs to be produced	0.10	\$325.00	\$32.50
5/13/2014	TNH	conf SC re serving doc production	0.30	\$325.00	\$97.50
5/13/2014	TNH	conf DAE re docs to serve re discovery	0.30	\$325.00	\$97.50
5/14/2014	DAE	conf TNH re waiting for Weller re redacted docs	0.10	\$600.00	\$60.00
5/14/2014	DAE	conf TNH re outcome of court appearance	0.10	\$600.00	\$60.00
5/14/2014	JOL	conf TNH re court appearance	0.20	\$600.00	\$120.00
5/14/2014	JOL	rev of new documents; appear on status	2.30	\$600.00	\$1,380.00
5/14/2014	SC	Processed mtn to compel, notice, made redwall	0.20	\$125.00	\$25.00
5/14/2014	TNH	JOL re court appearance	0.20	\$325.00	\$65.00
5/14/2014	TNH	conf DAE re outcome of court appearance	0.10	\$325.00	\$32.50
5/15/2014	AD	ecf	0.20	\$125.00	\$25.00
5/16/2014	SC	Processed ct order	0.10	\$125.00	\$12.50
5/17/2014	DAE	analyze new doc production	2.00	\$600.00	\$1,200.00
5/20/2014	DAE	read TNH email re Block dep	0.10	\$600.00	\$60.00
5/20/2014	TNH	check TNH and DAE availability for Block dep	0.10	\$325.00	\$32.50
5/20/2014	TNH	e-mail from J Weller re Block dep	0.10	\$325.00	\$32.50
5/20/2014	TNH	e-mail to DAE re Block dep	0.10	\$325.00	\$32.50
5/22/2014	SC	Processed email to expert	0.10	\$125.00	\$12.50
5/27/2014	AD	ecf	0.10	\$125.00	\$12.50
5/27/2014	DAE	conf TNH re outstanding issues re class	0.20	\$600.00	\$120.00

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		certification			
5/27/2014	JOL	rev of court order; conf hak	0.20	\$600.00	\$120.00
5/27/2014	SC	Emailed D's supplemental doc production to Block (in 9 separate emails)	0.30	\$125.00	\$37.50
5/27/2014	TNH	call Judge Grady's clerk re issue re motion to compel	0.20	\$325.00	\$65.00
5/27/2014	TNH	e-mail from J Weller re conference call	0.10	\$325.00	\$32.50
5/27/2014	TNH	conf DAE re outstanding issues re class certification	0.20	\$325.00	\$65.00
5/27/2014	TNH	call from Judge Grady clerk re resetting hearing for tomorrow	0.20	\$325.00	\$65.00
5/28/2014	JM	ecf	0.10	\$125.00	\$12.50
5/28/2014	SC	Processed court orders	0.10	\$125.00	\$12.50
5/29/2014	DAE	conf TNH re extending expert disco schedule	0.10	\$600.00	\$60.00
5/29/2014	DAE	Email TNH re additional disco needed	0.10	\$600.00	\$60.00
5/29/2014	JM	ecf	0.10	\$125.00	\$12.50
5/29/2014	SC	Prepared mtns to compel to file under seal, looked up rules, called clerk, took docs to court to file, made copies, took copies to clerk to file, prepared courtesy copies for judge	1.90	\$125.00	\$237.50
5/29/2014	SC	Looked up DAE, TNH schedules re: Block expert dep	0.20	\$125.00	\$25.00
5/29/2014	TNH	Emails to and from J Weller re availability for app before Judge Rowland	0.20	\$325.00	\$65.00
5/29/2014	TNH	Emails to and from J Weller re extending expert disco schedule	0.20	\$325.00	\$65.00
5/29/2014	TNH	Conf DAE re extending expert disco schedule	0.10	\$325.00	\$32.50
5/29/2014	TNH	Read DAE email re additional disco needed	0.10	\$325.00	\$32.50

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5/29/2014	TS	Saved 1 ECF file	0.10	\$125.00	\$12.50
5/30/2014	DR	ecf	0.20	\$125.00	\$25.00
5/30/2014	SC	processed ct orders	0.20	\$125.00	\$25.00
6/02/2014	DAE	email TNH/Block	0.20	\$600.00	\$120.00
6/02/2014	TNH	e-mail from RobBlock/ DAE	0.20	\$325.00	\$65.00
6/02/2014	TNH	review mtn for an extension of time	0.20	\$325.00	\$65.00
6/03/2014	TNH	e-mail to and from J Weller	0.20	\$325.00	\$65.00
6/04/2014	DR	ECF	0.10	\$125.00	\$12.50
6/04/2014	TNH	e-mail to and from J Weller	0.20	\$325.00	\$65.00
6/05/2014	CMC	conf DAE and TNH re disco and conf with J Weller	0.30	\$600.00	\$180.00
6/05/2014	DAE	conf TNH and CMC re disco and conf with J Weller	0.30	\$600.00	\$180.00
6/05/2014	SC	Processed d's motion for extension	0.10	\$125.00	\$12.50
6/05/2014	SC	Looked through D's document production for bates stamped docs D wants, emailed to OC	0.40	\$125.00	\$50.00
6/05/2014	TNH	conf J Weller re rescheduling conference call by 30 minutes	0.10	\$325.00	\$32.50
6/05/2014	TNH	e-mail to Rob Block re dep	0.20	\$325.00	\$65.00
6/05/2014	TNH	e-mail to and from J Weller re date or Block Dep	0.10	\$325.00	\$32.50
6/05/2014	TNH	review docs in preparation for conference with J Weller	1.50	\$325.00	\$487.50
6/05/2014	TNH	conf DAE and CMC re discovery and conf with J Weller	0.30	\$325.00	\$97.50
6/05/2014	TNH	conf with J weller re discovery issues	0.50	\$325.00	\$162.50
6/05/2014	TS	Saved 1 ECF file	0.10	\$125.00	\$12.50

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6/06/2014	SC	Processed ct order, made redwall	0.20	\$125.00	\$25.00
6/10/2014	AD	ecf	0.10	\$125.00	\$12.50
6/10/2014	DAE	conf TNH re mtn to compel and ntc of resolution	0.10	\$600.00	\$60.00
6/10/2014	SC	Drafted notice of resolution	0.30	\$125.00	\$37.50
6/10/2014	SC	Filed notice of resolution	0.20	\$125.00	\$25.00
6/10/2014	TNH	conf J Weller re mtns to compel.1	0.10	\$325.00	\$32.50
6/10/2014	TNH	e-mail to and from J Weller re mtns to compel	0.10	\$325.00	\$32.50
6/10/2014	TNH	ecf notification from court re new hearing time	0.10	\$325.00	\$32.50
6/10/2014	TNH	Conf DAE re mtn to compel and ntc of resolution	0.10	\$325.00	\$32.50
6/11/2014	AD	ecf	0.10	\$125.00	\$12.50
6/11/2014	DAE	Read/resp to TNH emails re withdrawing mtn to compel	0.20	\$600.00	\$120.00
6/11/2014	MRT	conf TNH re w/d mtns to compel	0.10	\$500.00	\$50.00
6/11/2014	SC	processed d's doc production, notice of resolution, court order, made redwall	0.20	\$125.00	\$25.00
6/11/2014	TNH	conf call with Judge Rowland's clerk re motions to compel	0.30	\$325.00	\$97.50
6/11/2014	TNH	conf J weller re striking appearance	0.20	\$325.00	\$65.00
6/11/2014	TNH	conf MRT re w/d mtns to compel	0.10	\$325.00	\$32.50
6/11/2014	TNH	e-mails to and from DAE re withdrawing mtn to compel	0.20	\$325.00	\$65.00
6/11/2014	TNH	call to Judge Rowland's chambers re court appearance this afternoon	0.20	\$325.00	\$65.00
6/12/2014	JM	ecf	0.10	\$125.00	\$12.50
6/12/2014	SC	Processed docs from D	0.10	\$125.00	\$12.50

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6/12/2014	SC	Emailed D's docs to Block	0.10	\$125.00	\$12.50
6/16/2014	SC	Processed ct order	0.10	\$125.00	\$12.50
6/19/2014	TNH	checks availability for dep	0.20	\$325.00	\$65.00
6/19/2014	TNH	e-mial to Block re availability for dep	0.20	\$325.00	\$65.00
6/20/2014	SC	Processed email re: dep of block	0.10	\$125.00	\$12.50
6/20/2014	TNH	e-mail to J Weller re Block's availability	0.10	\$325.00	\$32.50
6/23/2014	SC	Processed email to Block	0.10	\$125.00	\$12.50
6/24/2014	TNH	weller called re missing block exhibits	0.20	\$325.00	\$65.00
6/26/2014	SC	Printed, gathered d's disc for DAE	0.20	\$125.00	\$25.00
6/30/2014	SC	Processed notice of deposition of block	0.10	\$125.00	\$12.50
7/07/2014	SC	Made redwall	0.20	\$125.00	\$25.00
7/11/2014	DAE	review class response, research re esignature of note, discuss reply with CMC	3.00	\$600.00	\$1,800.00
7/12/2014	DAE	research for class reply	5.00	\$600.00	\$3,000.00
7/14/2014	AD	ecf	0.20	\$125.00	\$25.00
7/14/2014	CMC	dep prep	1.20	\$600.00	\$720.00
7/14/2014	CMC	class respaly	1.50	\$600.00	\$900.00
7/14/2014	CMC	conf TNH re docs for dep prep	0.30	\$600.00	\$180.00
7/14/2014	DAE	part 2 of meeting with TNH re Def's class response brief	0.50	\$600.00	\$300.00
7/14/2014	DAE	email TNH re mtn to file oversized brief	0.10	\$600.00	\$60.00
7/14/2014	DAE	email to and from TNH re docs from Weller	0.20	\$600.00	\$120.00
7/14/2014	DR	ECF	0.30	\$125.00	\$37.50
7/14/2014	SC	Looked through discovery to find docs block analyzed for CMC for dep prep	1.50	\$125.00	\$187.50

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7/14/2014	SC	Printed copies of response class cert for dae and cmc	0.20	\$125.00	\$25.00
7/14/2014	TNH	Called Judge Grady's clerk re oversized brief	0.20	\$325.00	\$65.00
7/14/2014	TNH	review NCA's class response brief	0.60	\$325.00	\$195.00
7/14/2014	TNH	e-mail from Weller re docs	0.10	\$325.00	\$32.50
7/14/2014	TNH	e-mail to and from DAE re docs from Weller	0.20	\$325.00	\$65.00
7/14/2014	TNH	e-mail to and from Block re docs and dep	0.30	\$325.00	\$97.50
7/14/2014	TNH	conf CMC re docs for dep prep	0.30	\$325.00	\$97.50
7/14/2014	TNH	part 2 of meeting with DAE re Def's class response brief	0.50	\$325.00	\$162.50
7/14/2014	TNH	Call from Judge Grady's clerk re opposition to d's motion	0.10	\$325.00	\$32.50
7/14/2014	TNH	Read/resp to DAE email re mtn to file oversized brief	0.10	\$325.00	\$32.50
7/15/2014	CMC	Conf DAE and TNH re docs from Weller	0.30	\$600.00	\$180.00
7/15/2014	CMC	Joint call to Weller from DAE, TNH, and CMC - left vm	0.10	\$600.00	\$60.00
7/15/2014	CMC	Conf DAE, JOL re case	0.30	\$600.00	\$180.00
7/15/2014	CMC	Conf call with TNH and Block	0.20	\$600.00	\$120.00
7/15/2014	CMC	Joint call with TNH and Weller	0.20	\$600.00	\$120.00
7/15/2014	CMC	dep prep & mot for prot ord & t/c Weller (3)	3.00	\$600.00	\$1,800.00
7/15/2014	DAE	Joint call to Weller from CMC, TNH and DAE - left vm	0.10	\$600.00	\$60.00
7/15/2014	DAE	Conf JOL, CMC re case	0.30	\$600.00	\$180.00
7/15/2014	DAE	Conf TNH and CMC re docs from Weller	0.30	\$600.00	\$180.00
7/15/2014	JOL	conf dae, cmc re case	0.30	\$600.00	\$180.00

7/15/2014	SC	Processed discovery and response to class cert	0.10	\$125.00	\$12.50
7/15/2014	TNH	conf call with CMC and Block	0.20	\$325.00	\$65.00
7/15/2014	TNH	joint call with CMC and Weller	0.20	\$325.00	\$65.00
7/15/2014	TNH	conf DAE and CMC re docs from Weller	0.30	\$325.00	\$97.50
7/15/2014	TNH	conf Block re conference call with CMC	0.20	\$325.00	\$65.00
7/15/2014	TNH	joint call to Weller from DAE, CMC and TNH- left vm	0.10	\$325.00	\$32.50
7/15/2014	TNH	e-mail to Block rescheduling telephone conference time	0.10	\$325.00	\$32.50
7/16/2014	CMC	Conf DAE and TNH re expert dep	0.30	\$600.00	\$180.00
7/16/2014	CMC	dep prep & DEP	11.70	\$600.00	\$7,020.00
7/16/2014	DAE	Conf CMC and TNH re expert dep	0.30	\$600.00	\$180.00
7/16/2014	DR	ecf	0.10	\$125.00	\$12.50
7/16/2014	DR	ecf	0.10	\$125.00	\$12.50
7/16/2014	SC	Looked up 10-Qs for CMC and DAE	0.50	\$125.00	\$62.50
7/16/2014	TNH	conf CMC and DAE re expert dep	0.30	\$325.00	\$97.50
7/17/2014	CMC	class reply	3.00	\$600.00	\$1,800.00
7/17/2014	NS	Looked for class size in disco	0.50	\$125.00	\$62.50
7/21/2014	CMC	class reply	4.20	\$600.00	\$2,520.00
7/21/2014	TNH	e-mail to Weller re expert witness report	0.10	\$325.00	\$32.50
7/22/2014	CMC	reply	5.00	\$600.00	\$3,000.00
7/22/2014	NS	Conf TNH and SC re deadline for Def's expert report	0.20	\$125.00	\$25.00
7/22/2014	SC	Conf TNH and NS re deadline for Def's expert report	0.20	\$125.00	\$25.00
7/22/2014	TNH	e-mail from J Weller re deadline for	0.10	\$325.00	\$32.50

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expert's report

7/22/2014	TNH	conf SC and NS re deadline for Def's expert report	0.20	\$325.00	\$65.00
7/23/2014	CMC	reply	1.00	\$600.00	\$600.00
7/23/2014	TNH	e-mail from Weller re deadline for serve expert report	0.10	\$325.00	\$32.50
7/24/2014	CMC	Conf TNH re affidavit re list of payday lenders	0.40	\$600.00	\$240.00
7/24/2014	CMC	work on class reply	2.00	\$600.00	\$1,200.00
7/24/2014	NS	Conf TNH and SC re list of payday lenders	0.30	\$125.00	\$37.50
7/24/2014	SC	Conf TNH and NS re list of payday lenders	0.30	\$125.00	\$37.50
7/24/2014	TNH	conf CMC re affidavit re list of payday lenders	0.40	\$325.00	\$130.00
7/24/2014	TNH	conf SC and NS re list of payday lenders	0.30	\$325.00	\$97.50
7/28/2014	CMC	work on reply	4.50	\$600.00	\$2,700.00
7/28/2014	NS	looked up pay day lenders	3.00	\$125.00	\$375.00
7/29/2014	CMC	class reply	4.00	\$600.00	\$2,400.00
7/29/2014	TES	Assist CMC with arbitration briefing	0.30	\$395.00	\$118.50
7/30/2014	CMC	Conf DAE and TNH re Block dep transcript	0.30	\$600.00	\$180.00
7/30/2014	CMC	Conf TNH re docs from file re brief re set off	0.30	\$600.00	\$180.00
7/30/2014	CMC	Conf DAE and TNH re address for payday loan yes	0.30	\$600.00	\$180.00
7/30/2014	CMC	work on class reply	4.00	\$600.00	\$2,400.00
7/30/2014	DAE	Conf CMC and TNH re address fo payday loan yes	0.30	\$600.00	\$180.00

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7/30/2014	DAE	Conf CMC and TNH re Block dep transcript	0.30	\$600.00	\$180.00
7/30/2014	NS	looked for address of payday loan yes	1.00	\$125.00	\$125.00
7/30/2014	TNH	conf CMC and DAE re address for payday loan yes	0.30	\$325.00	\$97.50
7/30/2014	TNH	research address for payday loan yes	0.30	\$325.00	\$97.50
7/30/2014	TNH	conf CMC and DAE re Block dep transcript	0.30	\$325.00	\$97.50
7/30/2014	TNH	conf CMC re docs from file re brief re set off	0.30	\$325.00	\$97.50
7/31/2014	CMC	work on class reply	4.00	\$600.00	\$2,400.00
7/31/2014	DAE	work on reply	4.00	\$600.00	\$2,400.00
7/31/2014	TNH	conf CMC re status of brief	0.30	\$325.00	\$97.50
8/07/2014	DAE	Conf TNH re extension of time to file reply brief	0.10	\$600.00	\$60.00
8/07/2014	NS	Conf TNH re mtn for an extension of time to file reply brief	0.30	\$125.00	\$37.50
8/07/2014	NS	drafting notice and motion for extension of time to file reply	0.60	\$125.00	\$75.00
8/07/2014	NS	drafted motion and notice for extension to file brief	1.20	\$125.00	\$150.00
8/07/2014	NS	filed notice and motion for extension	0.40	\$125.00	\$50.00
8/07/2014	TNH	REVIEW MTN FOR AN EXTENSION OF TIME	0.20	\$325.00	\$65.00
8/07/2014	TNH	REVIEW RULES RE NOTICING MTN FOR AN EXTENSION OF TIME	0.30	\$325.00	\$97.50
8/07/2014	TNH	CALLED JUDGE GRADY'S CLERK RE NOTICING MTN	0.20	\$325.00	\$65.00
8/07/2014	TNH	CONF DAE RE EXTENSION OF TIME TO FILE REPLY BRIEF	0.10	\$325.00	\$32.50
8/07/2014	TNH	E-MAIL TO AND FROM J WELLER RE EXTENSION OF TIME TO FILE REPLY	0.20	\$325.00	\$65.00

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BRIEF

Date	Party	Description	Hours	Rate	Amount
8/07/2014	TNH	CONF NS RE MTN FOR AN EXTENSION OF TIME TO FILE REPLY BRIEF	0.30	\$325.00	\$97.50
8/08/2014	NS	logged mtn for extension	0.10	\$125.00	\$12.50
8/08/2014	NS	logging paxton-redwalls	0.40	\$125.00	\$50.00
8/08/2014	NS	mailing courtesy copies to judge	0.20	\$125.00	\$25.00
8/17/2014	TNH	e-mail to client [REDACTED]	0.10	\$325.00	\$32.50
8/18/2014	DAE	Conf TNH re licensed payday lenders	0.20	\$600.00	\$120.00
8/18/2014	FRG	conf. TNH re: determining whether certain payday loan companies were licensed.	0.20	\$480.00	\$96.00
8/18/2014	TNH	edit and revise reply brief as per CMC	2.60	\$325.00	\$845.00
8/18/2014	TNH	review loan docs attached to Def's Opp. to CC re interest rates	1.00	\$325.00	\$325.00
8/18/2014	TNH	conf DAE re licensed payday lenders	0.20	\$325.00	\$65.00
8/18/2014	TNH	research lenders to confirm none are licensed	0.40	\$325.00	\$130.00
8/18/2014	TNH	conf FRG re unlicensed lender search on IDFP website	0.40	\$325.00	\$130.00
8/18/2014	TNH	e-mail to Matt Glavin re lenders and license	0.20	\$325.00	\$65.00
8/19/2014	TNH	working on creating Appendix D- list of lenders and jurisdiction	0.90	\$325.00	\$292.50
8/19/2014	TNH	review loan notes- work on chart	0.90	\$325.00	\$292.50
8/19/2014	TNH	review and revise brief as per CMC	3.80	\$325.00	\$1,235.00
8/20/2014	NS	finding exhibits in reply brief	0.60	\$125.00	\$75.00
8/20/2014	TNH	work on reply brief	4.40	\$325.00	\$1,430.00
8/21/2014	CMC	Conf TNH re brief and revisions	0.20	\$600.00	\$120.00

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8/21/2014	DAE	Conf TNH re notes and commonwealth	0.30	\$600.00	\$180.00
8/21/2014	DAE	Conf TNH re revisions to brief	0.40	\$600.00	\$240.00
8/21/2014	FRG	conf TNH re: class reply brief	0.40	\$480.00	\$192.00
8/21/2014	NS	Conf TNH re enlarged brief mtn	0.30	\$125.00	\$37.50
8/21/2014	NS	Conf TNH re mtn for an extension of time	0.30	\$125.00	\$37.50
8/21/2014	NS	logging d's mtn for extension, court order granting it	0.20	\$125.00	\$25.00
8/21/2014	NS	organizing exhibits for reply brief	0.20	\$125.00	\$25.00
8/21/2014	TNH	conf CMC re brief and revisions	0.20	\$325.00	\$65.00
8/21/2014	TNH	edit and revise brief- finalize	0.60	\$325.00	\$195.00
8/21/2014	TNH	e-mail to J Weller and from re extension of time to file brief	0.20	\$325.00	\$65.00
8/21/2014	TNH	conf FRG re commonwealth law	0.40	\$325.00	\$130.00
8/21/2014	TNH	conf NS re enlarged brief mtn	0.30	\$325.00	\$97.50
8/21/2014	TNH	review and revise enlarged brief mtn	0.10	\$325.00	\$32.50
8/21/2014	TNH	conf NS re mtn for an extension of time	0.30	\$325.00	\$97.50
8/21/2014	TNH	edit and revise mtn for an extension of time	0.10	\$325.00	\$32.50
8/21/2014	TNH	conf DAE re revisions to brief	0.40	\$325.00	\$130.00
8/21/2014	TNH	research two cases	0.50	\$325.00	\$162.50
8/21/2014	TNH	conf DAE re notes and commonwealth	0.30	\$325.00	\$97.50
8/22/2014	CMC	work on class reply	1.00	\$600.00	\$600.00
8/22/2014	NS	editing reply	1.70	\$125.00	\$212.50
8/22/2014	NS	drafting notice and motion to file under seal	0.70	\$125.00	\$87.50
8/25/2014	CMC	Conf TNH re next steps on brief	0.20	\$600.00	\$120.00
8/25/2014	TNH	Conf CMC re next steps on brief	0.20	\$325.00	\$65.00

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8/25/2014	TNH	review and revise brief- compare to DAE's edits	0.80	\$325.00	\$260.00
8/26/2014	NS	revised and filed reply in support of class cert	4.20	\$125.00	\$525.00
8/26/2014	NS	Conf TNH re revisions to brief	0.30	\$125.00	\$37.50
8/26/2014	NS	Conf TNH re filing under seal	0.40	\$125.00	\$50.00
8/26/2014	TNH	conf NS re filing under seal	0.40	\$325.00	\$130.00
8/26/2014	TNH	called J Weller	0.10	\$325.00	\$32.50
8/26/2014	TNH	review e-mails in Jones v. NCA re what docs are confidential	0.40	\$325.00	\$130.00
8/26/2014	TNH	review and revise brief	0.40	\$325.00	\$130.00
8/26/2014	TNH	conf NS re revisions to brief	0.30	\$325.00	\$97.50
8/26/2014	TNH	review and confirm exhibits for reply brief	0.30	\$325.00	\$97.50
8/27/2014	CM	helped NS make courtesy copy of reply for judge	1.00	\$125.00	\$125.00
8/27/2014	NS	binding courtesy copy, delivering copies to OC and judge, filing sealed copy	3.60	\$125.00	\$450.00
8/27/2014	NS	Conf TNH re delivery copies to oc	0.10	\$125.00	\$12.50
8/27/2014	TNH	e-mail from and to J Weller re status of unredacted copy	0.20	\$325.00	\$65.00
8/27/2014	TNH	conf NS re delivery copies to oc	0.10	\$325.00	\$32.50
8/27/2014	TNH	ecf notification re mtn for leave to file under seal and enlarged brief	0.10	\$325.00	\$32.50
8/29/2014	NS	logging motion for extension, class cert reply, ct. order	0.40	\$125.00	\$50.00
9/05/2014	CMC	work on surreply	3.00	\$600.00	\$1,800.00
9/08/2014	CMC	work on surreply	2.50	\$600.00	\$1,500.00
9/11/2014	CMC	Conf DAE, JOL re surreply	0.50	\$600.00	\$300.00

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9/11/2014	DAE	Conf JOL, CMC re surreply	0.50	\$600.00	\$300.00
9/11/2014	JOL	rev of deft sur-reply re class cert.; conf re surreply dae, cmc	0.70	\$600.00	\$420.00
9/12/2014	CMC	Conf DEA, JOL re rev of surreply	0.50	\$600.00	\$300.00
9/12/2014	CMC	work on sursur reply	2.00	\$600.00	\$1,200.00
9/12/2014	DAE	Conf JOL, CMC re rev of surreply	0.50	\$600.00	\$300.00
9/12/2014	JOL	rev of sur-reply to class cert; conf dae, cmc	0.70	\$600.00	\$420.00
9/15/2014	CMC	work on sursur reply	2.00	\$600.00	\$1,200.00
10/10/2014	NS	logging d's mtn for sur-reply	0.10	\$125.00	\$12.50
10/13/2014	NS	logging d's supp. doc production	0.10	\$125.00	\$12.50
10/14/2014	NS	drafting mtn for extension	0.80	\$125.00	\$100.00
10/14/2014	NS	filing mtn for extension	0.30	\$125.00	\$37.50
10/22/2014	NS	drafting notice of address change	0.10	\$125.00	\$12.50
10/28/2014	NS	logging minute entry	0.10	\$125.00	\$12.50
10/29/2014	CMC	work on resp to surreply	4.00	\$600.00	\$2,400.00
10/30/2014	CMC	work on brief	4.00	\$600.00	\$2,400.00
10/31/2014	CMC	work on brief	3.00	\$600.00	\$1,800.00
10/31/2014	NS	finding docs for CMC	0.70	\$125.00	\$87.50
10/31/2014	NS	call to location of block dep re invoice	0.20	\$125.00	\$25.00
10/31/2014	NS	Conf TNH re bill re Block transcript	0.30	\$125.00	\$37.50
10/31/2014	TNH	conf NS re bill re Block transcript	0.30	\$325.00	\$97.50
10/31/2014	TNH	Copied on email from NS to Weller	0.10	\$325.00	\$32.50
11/03/2014	CMC	work on resp to sur reply	4.00	\$600.00	\$2,400.00
11/04/2014	CMC	work on resp to sur reply	6.00	\$600.00	\$3,600.00

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11/04/2014	DAE	review and revise surreply	1.00	\$600.00	\$600.00
11/05/2014	CMC	work on resp to sur-reply	6.00	\$600.00	\$3,600.00
11/06/2014	NS	logging ct orders	0.10	\$125.00	\$12.50
11/06/2014	NS	filing notice of change of address	0.20	\$125.00	\$25.00
11/06/2014	NS	drafting mtn for oversized brief	0.30	\$125.00	\$37.50
11/07/2014	NS	preparing exhibits for surreponse	0.20	\$125.00	\$25.00
11/10/2014	CMC	Conf TNH re brief	0.30	\$600.00	\$180.00
11/10/2014	CMC	wrok on resp to surreply	1.00	\$600.00	\$600.00
11/10/2014	NS	Conf TNH re filing brief	0.20	\$125.00	\$25.00
11/10/2014	NS	filing surresponse in support of class cert	1.20	\$125.00	\$150.00
11/10/2014	TNH	conf NS re filing brief	0.20	\$325.00	\$65.00
11/10/2014	TNH	conf CMC re brief	0.30	\$325.00	\$97.50
11/10/2014	TNH	review mtn to file an enlarged brief	0.20	\$325.00	\$65.00
11/11/2014	NS	correcting notice for surresponse	0.20	\$125.00	\$25.00
11/12/2014	NS	filing surresponse in support of class cert and delivering courtesy copy	0.60	\$125.00	\$75.00
11/12/2014	TNH	ecf order- no appearance required	0.10	\$325.00	\$32.50
11/13/2014	NS	logging motion for leave to file oversize, order, surresponse	0.30	\$125.00	\$37.50
12/12/2014	NS	logging ct order	0.10	\$125.00	\$12.50
12/17/2014	NS	drafting letter to mr. block	0.30	\$125.00	\$37.50
12/18/2014	NS	letter to mr. block re invoice	0.30	\$125.00	\$37.50
12/19/2014	CMC	resp to surr reply	2.00	\$600.00	\$1,200.00
12/22/2014	NS	logging ct orders	0.20	\$125.00	\$25.00
12/29/2014	DAE	email from TNH	0.10	\$600.00	\$60.00
12/29/2014	NS	revising letter to OC re block invoice	0.50	\$125.00	\$62.50

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12/29/2014	NS	sending letter re block invoice	0.10	\$125.00	\$12.50
12/29/2014	NS	Conf TNH re letter to Weller re payment of expert	0.20	\$125.00	\$25.00
12/29/2014	TNH	e-mail to DAE	0.10	\$325.00	\$32.50
12/29/2014	TNH	conf NS re letter to Weller re payment of expert	0.20	\$325.00	\$65.00
1/08/2015	CMC	conf re: sett	0.30	\$600.00	\$180.00
1/08/2015	NS	call to ms. paxton	0.60	\$125.00	\$75.00
1/08/2015	TNH	Status Hearing before Judge Holderman	1.00	\$325.00	\$325.00
1/15/2015	TNH	e-mail to and from client	0.30	\$325.00	\$97.50
1/22/2015	CMC	conf TNH and DAE re case and J Weller's concerns re dismissal language	0.30	\$700.00	\$210.00
1/22/2015	SS	logged/filed docs.	0.30	\$125.00	\$37.50
1/27/2015	NS	drafting position statement in preparation for settlement conference	1.80	\$125.00	\$225.00
2/02/2015	NS	calls to client	0.20	\$125.00	\$25.00
2/02/2015	TNH	edit and revise position letter	0.60	\$325.00	\$195.00
2/02/2015	TNH	edit and revise position letter as per DAE	0.40	\$325.00	\$130.00
2/03/2015	CMC	Conf TNH, DAE, JOL re settlement	0.10	\$600.00	\$60.00
2/03/2015	CMC	work on sett letter	0.20	\$600.00	\$120.00
2/03/2015	DAE	Conf JOL, TNH, CMC re settlement	0.10	\$600.00	\$60.00
2/03/2015	JOL	work on settlement letter; rev of file; rev of file; research; conf th, dae ,cmc	3.00	\$600.00	\$1,800.00
2/03/2015	JOL	Conf TNH re revisions to settlement letter	0.50	\$600.00	\$300.00
2/03/2015	NS	drafting position statement for settlement conference	2.50	\$125.00	\$312.50

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2/03/2015	NS	prepping docs for settlement conference	1.10	\$125.00	\$137.50
2/03/2015	NS	drafting memo for settlement conference	0.50	\$125.00	\$62.50
2/03/2015	TNH	work on settlement conference letter	0.50	\$325.00	\$162.50
2/03/2015	TNH	conf JOL re revisions to settlement letter	0.50	\$325.00	\$162.50
2/03/2015	TNH	Conf DAE, CMC, JOL re settlement	0.10	\$325.00	\$32.50
2/04/2015	CMC	sett conf	5.50	\$600.00	\$3,300.00
2/04/2015	NS	email to TNH re Jones v. NCA settlement, email w/ Thomasson's number	0.40	\$125.00	\$50.00
2/04/2015	NS	emailing TNH and DAE travelers insurance docs	0.30	\$125.00	\$37.50
2/04/2015	TNH	meeting with client in advance of settlement conference	0.50	\$325.00	\$162.50
2/04/2015	TNH	settlement conference with Judge Holderman	5.00	\$325.00	\$1,625.00
2/27/2015	SS	logged/filed docs	0.10	\$125.00	\$12.50
2/27/2015	SS	logged/filed doc	0.10	\$125.00	\$12.50
3/10/2015	DAE	sett conf	1.50	\$600.00	\$900.00
3/10/2015	DAE	conf TNH re letter from Weller re class size	0.30	\$600.00	\$180.00
3/10/2015	TNH	conf DAE re letter from Weller re class size	0.30	\$325.00	\$97.50
3/25/2015	NS	logging minute entry	0.10	\$125.00	\$12.50
4/07/2015	NS	drafting and filing mtn for extension re 4th am mtn for class cert	0.90	\$125.00	\$112.50
4/07/2015	TNH	work on class mtn	1.00	\$325.00	\$325.00
4/10/2015	NS	changing judges name on class papers	0.10	\$125.00	\$12.50
4/13/2015	NS	prepping docs for mtn for class cert	0.20	\$125.00	\$25.00

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5/07/2015	NS	drafting joing initial status report	1.10	\$125.00	\$137.50
5/08/2015	NS	revisions to joint status report	0.50	\$125.00	\$62.50
5/08/2015	NS	sending report to d's counsel	0.20	\$125.00	\$25.00
5/12/2015	DAE	conf TNH re case and settlement discussions	0.20	\$600.00	\$120.00
5/12/2015	NS	prepping docs for court appearance	0.20	\$125.00	\$25.00
5/12/2015	NS	work on mtn for extension, 4th am class mtn	0.30	\$125.00	\$37.50
5/12/2015	TNH	conf DAE re case and settlement discussions	0.20	\$325.00	\$65.00
6/03/2015	NS	drafting and filing mtn for extension re 2nd am comp	0.50	\$125.00	\$62.50
6/04/2015	NS	revisions to 2nd am comp	0.40	\$125.00	\$50.00
6/05/2015	NS	revising and filing second amended complaint	0.60	\$125.00	\$75.00
6/08/2015	NS	serving courtesy copy of second am comp	0.40	\$125.00	\$50.00
6/25/2015	CMC	work on 2d amended complaint	0.30	\$700.00	\$210.00
6/25/2015	JOL	rev of answer and affirmative defenses to amended complaint	0.40	\$700.00	\$280.00
7/03/2015	JOL	review of answer and affirmative defenses to 2nd amended complaint	0.40	\$700.00	\$280.00
7/08/2015	KO	Preparing documents for call	0.50	\$125.00	\$62.50
7/09/2015	DAE	t/c re settlement	1.00	\$700.00	\$700.00
7/10/2015	CMC	conf w atty def re: settlement	0.40	\$700.00	\$280.00
7/13/2015	CMC	t/c atty def re: settlement	0.40	\$700.00	\$280.00
8/26/2015	DAE	email TNH re status of settlement	0.10	\$700.00	\$70.00
8/26/2015	DAE	conf TNH re status of settlement	0.20	\$700.00	\$140.00

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8/26/2015	TNH	e-mail to Weller re status of settlement	0.10	\$325.00	\$32.50
8/26/2015	TNH	e-mail from DAE re status of settlement	0.10	\$325.00	\$32.50
8/26/2015	TNH	conf DAE re status of settlement	0.20	\$325.00	\$65.00
8/27/2015	DAE	conf TNH re status of settlement and filing IN case	0.10	\$700.00	\$70.00
8/27/2015	KO	conf TNH re serving dep notices	0.20	\$125.00	\$25.00
8/27/2015	TNH	e-mail from Weller re status of settlement	0.10	\$325.00	\$32.50
8/27/2015	TNH	conf DAE re status of settlement and filing IN case	0.10	\$325.00	\$32.50
9/01/2015	KO	Assembled docs for TNH court appearance	0.20	\$125.00	\$25.00
9/01/2015	TNH	Status Hearing	0.60	\$325.00	\$195.00
9/29/2015	KO	Assembled docs of defendant's opposition for DAE	0.30	\$125.00	\$37.50
9/30/2015	KO	Memo to docket re reminder dates for reply to class cert motion	0.10	\$125.00	\$12.50
10/16/2015	KO	Sent signed TNH letter to OC and saved to TM	0.20	\$125.00	\$25.00
10/16/2015	KO	Prepared docs for TNH re class cert motion	0.30	\$125.00	\$37.50
10/16/2015	KO	Draft of letter to DAE to review	0.10	\$125.00	\$12.50
10/16/2015	TNH	letter to oc re new case	0.30	\$325.00	\$97.50
10/19/2015	KO	Located exhibits for class reply, compared drafts, saved new draft to TM	0.30	\$125.00	\$37.50
10/19/2015	TNH	review brief- edit and revise	2.40	\$325.00	\$780.00
10/20/2015	DAE	conf [REDACTED] re client's [REDACTED]	0.30	\$700.00	\$210.00
10/20/2015	KO	Drafted Mtn for Extension of time to file class cert reply	0.30	\$125.00	\$37.50
10/20/2015	KO	Looked up Judge's local motion practice	0.10	\$125.00	\$12.50

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rules

10/20/2015	KO	Finalized and Filed Mtn for Extension and Notice, Saved to TM	0.50	\$125.00	\$62.50
10/20/2015	TNH	conf DAE re client's bankruptcy petition	0.30	\$325.00	\$97.50
10/20/2015	TNH	e-mail to and from client re [REDACTED]	0.30	\$325.00	\$97.50
10/20/2015	TNH	e-mail to [REDACTED] re client's [REDACTED]	0.40	\$325.00	\$130.00
10/20/2015	TNH	conf BK atty office re amendment	0.20	\$325.00	\$65.00
10/21/2015	TNH	conf J Weller re settlement conference with JAMS	0.40	\$325.00	\$130.00
10/22/2015	KO	Checked bankruptcy court docket sheet	0.10	\$125.00	\$12.50
10/23/2015	DAE	conf TNH re filing in bankruptcy yesterday	0.30	\$700.00	\$210.00
10/23/2015	DAE	conf TNH re fee split re mediation	0.30	\$700.00	\$210.00
10/23/2015	KO	Checked bankruptcy court docket sheet, saved semrand's mtn for attorneys fees to tm, notified TNH	0.30	\$125.00	\$37.50
10/23/2015	TNH	Email P's counsel re mediation fee	0.30	\$325.00	\$97.50
10/23/2015	TNH	Conf DAE re filing in bankruptcy yesterday	0.30	\$325.00	\$97.50
10/23/2015	TNH	e-mails to and from Bankruptcy attorney concerning the filing of the bankruptcy petition amendment	0.40	\$325.00	\$130.00
10/23/2015	TNH	conf DAE re fee split re mediation	0.30	\$325.00	\$97.50
10/26/2015	CMC	conf TNH re brief	0.50	\$700.00	\$350.00
10/26/2015	CMC	work on class reply	1.00	\$700.00	\$700.00
10/26/2015	TNH	conf cmc RE BRIEF	0.50	\$325.00	\$162.50
10/26/2015	TNH	edit and revise brief	0.50	\$325.00	\$162.50
10/27/2015	CMC	rec and resp to emails	0.10	\$700.00	\$70.00

10/27/2015	CMC	conf TNH re brief	0.50	\$700.00	\$350.00
10/27/2015	CMC	work on class reply	1.00	\$700.00	\$700.00
10/27/2015	DAE	conf TNH re class size	0.50	\$700.00	\$350.00
10/27/2015	DAE	conf TNH re shepardizing cases	0.30	\$700.00	\$210.00
10/27/2015	KO	Proof-reading reply brief	0.60	\$125.00	\$75.00
10/27/2015	TNH	research new cases cited in response brief	2.10	\$325.00	\$682.50
10/27/2015	TNH	conf CMC re brief/ DAE re class size	0.50	\$325.00	\$162.50
10/27/2015	TNH	conf DAE re shepardizing cases	0.30	\$325.00	\$97.50
10/27/2015	TNH	edit and revise brief (Class Reply)	1.20	\$325.00	\$390.00
10/28/2015	KO	Filed motion for leave to file under seal	0.20	\$125.00	\$25.00
10/28/2015	KO	Filed notice of motion for leave to file under seal	0.20	\$125.00	\$25.00
10/28/2015	KO	Assembled exhibits for filing reply brief under seal	0.50	\$125.00	\$62.50
10/28/2015	KO	Filed reply under seal	0.50	\$125.00	\$62.50
10/28/2015	KO	Edited mtn for leave to file under seal and notice, sent to TNH for review	0.20	\$125.00	\$25.00
10/28/2015	TNH	edit and revise brief as per DAE-shepardize cases	2.60	\$325.00	\$845.00
10/29/2015	KO	Looked up judge's local rules	0.20	\$125.00	\$25.00
10/29/2015	KO	Sent copy of reply to OC JW via email	0.10	\$125.00	\$12.50
10/29/2015	KO	Assembled courtesy copies of reply and corresponding motion for leave to file under seal	1.00	\$125.00	\$125.00
11/02/2015	CMC	prep for mediator's conf	0.50	\$700.00	\$350.00
11/02/2015	CMC	conf TNH re mediation conference call and docs needed	0.20	\$700.00	\$140.00
11/02/2015	CMC	Prep & conference with mediator	1.00	\$700.00	\$700.00

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11/02/2015	KO	read/resp to TNH emails re filing reply under seal	0.20	\$125.00	\$25.00
11/02/2015	KO	Prepped docs for TNH CMC call	0.10	\$125.00	\$12.50
11/02/2015	TNH	Call w/JAMS, Judge Holderman, Dial 1-877-696-5267, Wait for Greeting, Press *0 and Request Holderman	1.00	\$325.00	\$325.00
11/02/2015	TNH	review files and prep for conference call with Judge Holderman	1.30	\$325.00	\$422.50
11/02/2015	TNH	conf CMC re mediation conference call and docs needed	0.20	\$325.00	\$65.00
11/02/2015	TNH	e-mail to and from KO re filing reply under seal	0.20	\$325.00	\$65.00
11/03/2015	TNH	E-MAIL FROM JAMS RE PAYMENT DUE AND DOCS TO BE SUBMITTED	0.20	\$325.00	\$65.00
11/04/2015	KO	Docketed mediation schedule dates	0.20	\$125.00	\$25.00
11/05/2015	KO	Compiled list of phone numbers of clients to be reached during mediation	0.20	\$125.00	\$25.00
11/05/2015	KO	Drafted and sent letter to client [REDACTED]	0.30	\$125.00	\$37.50
11/05/2015	TNH	review and revise letters to clients [REDACTED]	0.30	\$325.00	\$97.50
11/06/2015	KO	Memo re mediation conference	0.30	\$125.00	\$37.50
11/06/2015	TNH	work on settlement position letter and checklist	5.10	\$325.00	\$1,657.50
11/09/2015	DAE	conf TNH re position statement and checklist	0.40	\$700.00	\$280.00
11/09/2015	KO	Check request for mediation fees at JAMS	0.10	\$125.00	\$12.50
11/09/2015	TNH	conf DAE re position statement and checklist	0.40	\$325.00	\$130.00
11/09/2015	TNH	edit and revise position statement as per DAE	1.30	\$325.00	\$422.50

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11/09/2015	TNH	edit and revise position statement and checklist	2.10	\$325.00	\$682.50
11/10/2015	DAE	email TNH re mediation fee	0.10	\$700.00	\$70.00
11/10/2015	TNH	e-mail from Jams re cancellation of mediation & payment	0.10	\$325.00	\$32.50
11/10/2015	TNH	e-mail from DAE re mediation fee	0.10	\$325.00	\$32.50
11/12/2015	KO	Emails with TNH and JAMS re payment	0.30	\$125.00	\$37.50
11/12/2015	KO	emails to and from OC and TNH re word version of checklist	0.30	\$125.00	\$37.50
11/12/2015	TNH	e-mails to and from oc and KO re word version of checklist	0.30	\$325.00	\$97.50
11/12/2015	TNH	Read/resp to KO and JAMS emails re mediation payment	0.30	\$325.00	\$97.50
11/13/2015	TNH	ECF NOTIFICATION RE COURT APPEARANCE ADJOURNED	0.10	\$325.00	\$32.50
11/16/2015	KO	Sorted back-logging/file cabinet organization	0.30	\$125.00	\$37.50
11/17/2015	KO	conf TNH re payment of mediation fee	0.30	\$125.00	\$37.50
11/17/2015	KO	Printed and assembled copies of conference docs for DAE and CMC	0.30	\$125.00	\$37.50
11/17/2015	KO	Back-logging	1.00	\$125.00	\$125.00
11/17/2015	TNH	conf KO re payment of mediation fee	0.30	\$325.00	\$97.50
11/17/2015	TNH	review and revise letter to ct requesting adjournment of conf.	0.30	\$325.00	\$97.50
11/17/2015	TNH	Email JW and DS requesting consent to request adjour. of conf.	0.20	\$325.00	\$65.00
11/18/2015	CMC	prep for mediation	2.00	\$700.00	\$1,400.00
11/18/2015	CMC	conf CMC re case and def's arguments	0.40	\$700.00	\$280.00
11/18/2015	TNH	conf CMC re case and def's arguments	0.40	\$325.00	\$130.00
11/19/2015	CMC	prep for mediation; draft letter	2.00	\$700.00	\$1,400.00

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11/20/2015	CMC	Read email from TNH re stip	0.10	\$700.00	\$70.00
11/20/2015	DAE	read email from TNH re stip	0.10	\$700.00	\$70.00
11/20/2015	TNH	read/resp to client emails	0.20	\$325.00	\$65.00
11/20/2015	TNH	email DAE and CMC re Stip filed	0.10	\$325.00	\$32.50
11/23/2015	KO	Prepped docs and info sheets for Conference	0.30	\$125.00	\$37.50
11/24/2015	CMC	attendance at mediation	6.00	\$700.00	\$4,200.00
11/24/2015	CMC	conf TNH re clients	0.20	\$700.00	\$140.00
11/24/2015	DAE	Read/resp to TNH emails re arthur mitchell	0.30	\$700.00	\$210.00
11/24/2015	DAE	mediation (1/2)	3.00	\$700.00	\$2,100.00
11/24/2015	TNH	conf CMC re clients	0.20	\$325.00	\$65.00
11/24/2015	TNH	e-mails to and from DAE re arthur mitchell	0.30	\$325.00	\$97.50
11/24/2015	TNH	review mitchell file	0.30	\$325.00	\$97.50
12/07/2015	TNH	Status	0.60	\$325.00	\$195.00
1/07/2016	CMC	work on sett docs	1.00	\$700.00	\$700.00
1/12/2016	CMC	work on sett agree	1.00	\$700.00	\$700.00
1/19/2016	TNH	Read/resp to email from J Weller	0.20	\$325.00	\$65.00
1/20/2016	CMC	conf TNH re revisions to settlement agreement	0.20	\$700.00	\$140.00
1/20/2016	CMC	conf TNH and DAE re settlement agreement	0.30	\$700.00	\$210.00
1/20/2016	DAE	conf CMC and TNH re settlement agreement	0.30	\$700.00	\$210.00
1/20/2016	TNH	review settlement agreement	0.60	\$325.00	\$195.00
1/20/2016	TNH	conf CMC and DAE re settlement agreement	0.30	\$325.00	\$97.50

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1/20/2016	TNH	Conf CMC re revisions to settlement agreement	0.20	\$325.00	\$65.00
1/20/2016	TNH	e-mail J Weller re agreement	0.10	\$325.00	\$32.50
1/21/2016	TNH	edit and revise agreement	0.40	\$325.00	\$130.00
1/22/2016	CMC	work on sett docs	1.00	\$700.00	\$700.00
1/22/2016	DAE	conf CMC and TNH re case and J Weller's concerns re dismissal language	0.30	\$700.00	\$210.00
1/22/2016	TNH	e-mail to and from J Weller re appearance on Monday	0.10	\$325.00	\$32.50
1/22/2016	TNH	edit and revise class agreement	1.20	\$325.00	\$390.00
1/22/2016	TNH	conf J Weller re case	0.40	\$325.00	\$130.00
1/22/2016	TNH	conf DAE and CMC re case- and J Weller's concerns re dismissal language	0.30	\$325.00	\$97.50
2/09/2016	TNH	e-mail to OC re status of settlement docs	0.10	\$325.00	\$32.50
2/23/2016	TNH	review oc revisions to the settlement agreement	0.30	\$325.00	\$97.50
2/23/2016	TNH	e-mails to and from J Weller re settlement conference call	0.20	\$325.00	\$65.00
2/23/2016	TNH	conf J Weller re conference call	0.20	\$325.00	\$65.00
2/24/2016	CMC	conf DAE and TNH re agreement	0.60	\$700.00	\$420.00
2/24/2016	CMC	conf TNH re letter to OC	0.30	\$700.00	\$210.00
2/24/2016	DAE	conf CMC and TNH re agreement	0.60	\$700.00	\$420.00
2/24/2016	FRG	WL research on appealability of dismissals with prejudice	0.80	\$500.00	\$400.00
2/24/2016	KO	Conf with TNH re status of paxton preliminary approval/motion to enforce settlement	0.20	\$125.00	\$25.00

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2/24/2016	TNH	conf CMC re letter to oc	0.30	\$325.00	\$97.50
2/24/2016	TNH	conf KO re status of paxton prelim approval mtn /to enforce settlement	0.20	\$325.00	\$65.00
2/24/2016	TNH	conf DAE and CMC re agreement	0.60	\$325.00	\$195.00
2/24/2016	TNH	e-mail to JW re settlement agreement	0.40	\$325.00	\$130.00
2/25/2016	KO	Docket new hearing date and ddl to file preliminary approval motion	0.20	\$125.00	\$25.00
2/29/2016	KO	Assembled copies of class docs for DAE, CMC, TNH	0.50	\$125.00	\$62.50
2/29/2016	KO	Docketed dates for prelim approval hearing and final approval motion	0.10	\$125.00	\$12.50
3/01/2016	CMC	work on sett docs	1.00	\$700.00	\$700.00
3/01/2016	KO	Logging minute order	0.10	\$125.00	\$12.50
3/02/2016	KO	Saved all class docs from OC to TM, saved ecig versions for editing	0.30	\$125.00	\$37.50
3/03/2016	KO	Password protecting docs with financial info from defendants	0.20	\$125.00	\$25.00
3/03/2016	KO	Made CMC changes to class docs	0.40	\$125.00	\$50.00
3/03/2016	TNH	conf CMC re revisions to class settlement docs	0.30	\$325.00	\$97.50
3/03/2016	TNH	review class settlement docs	0.90	\$325.00	\$292.50
3/04/2016	DAE	conf TNH re class settlement docs	0.30	\$700.00	\$210.00
3/04/2016	TNH	conf DAE re class settlement docs	0.30	\$325.00	\$97.50
3/04/2016	TNH	review and revise class settlement docs	0.70	\$325.00	\$227.50
3/08/2016	KO	Checked judges rules re number of days notice required to file preliminary approval motion	0.20	\$125.00	\$25.00
3/08/2016	KO	Printed/assembled class docs for TNH to review	0.30	\$125.00	\$37.50
3/09/2016	CMC	work on class settleemnt docs; rev and resp to emails	1.00	\$700.00	\$700.00

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3/09/2016	KO	Sent stip of dismissal to oc	0.10	\$125.00	\$12.50
3/09/2016	KO	emails to and from TNH re redlines, discussed redlines with CMC	0.30	\$125.00	\$37.50
3/09/2016	TNH	read/resp to KO emails re redlines	0.30	\$325.00	\$97.50
3/10/2016	KO	Logged joint mtn for preliminary approval and notice of motion	0.10	\$125.00	\$12.50
3/11/2016	CMC	read KO email re stip of dismissal	0.10	\$700.00	\$70.00
3/11/2016	KO	Email to OC re advise re stip of dismissal	0.10	\$125.00	\$12.50
3/11/2016	KO	Email re no response from Polsinelli	0.10	\$125.00	\$12.50
3/11/2016	KO	Assemble docs for TNH court appearance on Monday	0.30	\$125.00	\$37.50
3/11/2016	KO	Email to TNH/CMC re stipulation of dismissal	0.10	\$125.00	\$12.50
3/11/2016	KO	Logging notes re prelim approval docs	0.10	\$125.00	\$12.50
3/11/2016	TNH	read KO email re stip of dismissal	0.10	\$325.00	\$32.50
3/14/2016	CMC	conf TNH re prelim approval hearing	0.30	\$700.00	\$210.00
3/14/2016	CMC	conf TNH re revisions to final approval order re second mailing	0.30	\$700.00	\$210.00
3/14/2016	KO	Prepared preliminary approval checklist for TNH	0.50	\$125.00	\$62.50
3/14/2016	KO	Logged notice of compliance	0.10	\$125.00	\$12.50
3/14/2016	TNH	Joint Mtn for Preliminary Approval	1.00	\$325.00	\$325.00
3/14/2016	TNH	conf CMC re preliminary approval hearing	0.30	\$325.00	\$97.50
3/14/2016	TNH	e-mails to and from Weller re Final Approval Order	0.40	\$325.00	\$130.00
3/14/2016	TNH	conf CMC re revisions to final approval order re second mailing	0.30	\$325.00	\$97.50

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3/15/2016	KO	Save young v. unifund memo to case for TNH prep of fee petition	0.10	\$125.00	\$12.50
3/17/2016	KO	Logging stipulation of dismissal and minute entry	0.20	\$125.00	\$25.00
3/18/2016	KO	Mark dates to be docketed on preliminary approval order	0.30	\$125.00	\$37.50
3/18/2016	KO	Logging minute entry	0.10	\$125.00	\$12.50
3/21/2016	KO	Logging preliminary approval order	0.10	\$125.00	\$12.50
3/24/2016	TNH	e-mails to and from JP re class notice links	0.30	\$325.00	\$97.50
3/24/2016	TNH	e-mails to and from Jennifer Weller re notice and contacting the Court	0.20	\$325.00	\$65.00
3/25/2016	KO	Logging minute order	0.10	\$125.00	\$12.50
3/25/2016	TNH	conf call with Weller and Court to vacate order granting plaintiff's motion for class certification	0.30	\$325.00	\$97.50
4/11/2016	KO	Work on paralegal memo	0.60	\$125.00	\$75.00
4/13/2016	KO	Print SA for TNH review	0.10	\$125.00	\$12.50
4/14/2016	KO	Email to TNH re claim form question	0.10	\$125.00	\$12.50
4/14/2016	KO	Edits to paralegal memo	0.20	\$125.00	\$25.00
4/14/2016	TNH	read email from KO re claim form question/resp to same	0.10	\$325.00	\$32.50
4/15/2016	KO	Class member call	0.10	\$125.00	\$12.50
4/15/2016	KO	Class member call	0.10	\$125.00	\$12.50
4/15/2016	KO	Class member call	0.10	\$125.00	\$12.50
4/15/2016	KO	Class member call	0.10	\$125.00	\$12.50
4/15/2016	KO	Class member phone call/voicemail	0.10	\$125.00	\$12.50
4/15/2016	KO	class member call	0.10	\$125.00	\$12.50
4/15/2016	KO	Edits to paralegal memo, sent to all paralegals	0.40	\$125.00	\$50.00

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4/15/2016	KO	Class member call	0.10	\$125.00	\$12.50
4/15/2016	KO	More changes to paralegal memo	0.30	\$125.00	\$37.50
4/15/2016	SS	phone call with class member	0.40	\$125.00	\$50.00
4/15/2016	TNH	EDIT AND REVISE PARALEGAL MEMO	0.30	\$325.00	\$97.50
4/18/2016	KO	Class member call	0.20	\$125.00	\$25.00
4/18/2016	KO	Class member call	0.10	\$125.00	\$12.50
4/18/2016	KO	Class member phone call	0.20	\$125.00	\$25.00
4/18/2016	KO	Class member call	0.10	\$125.00	\$12.50
4/18/2016	KO	class member call	0.10	\$125.00	\$12.50
4/18/2016	KO	class member call	0.10	\$125.00	\$12.50
4/18/2016	KO	Class member call	0.10	\$125.00	\$12.50
4/18/2016	KO	Class member call and voicemail	0.10	\$125.00	\$12.50
4/18/2016	NM	re settlement letter	0.20	\$125.00	\$25.00
4/19/2016	KO	Phone call with class member	0.10	\$125.00	\$12.50
4/19/2016	KO	Call with class member	0.10	\$125.00	\$12.50
4/19/2016	KO	Forwarding claim forms to OC, conf TNH re same	0.30	\$125.00	\$37.50
4/19/2016	KO	Call with class member	0.10	\$125.00	\$12.50
4/19/2016	KO	voicemail for class member	0.10	\$125.00	\$12.50
4/19/2016	KO	Call with class member	0.10	\$125.00	\$12.50
4/19/2016	RE	Phone call with class member	0.30	\$125.00	\$37.50
4/19/2016	TNH	conf KO re claim forms	0.30	\$325.00	\$97.50
4/20/2016	KO	class member call	0.10	\$125.00	\$12.50
4/20/2016	KO	class member phone call	0.10	\$125.00	\$12.50

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4/20/2016	KO	Phone call with class member	0.10	\$125.00	\$12.50
4/20/2016	KO	Call with class member	0.10	\$125.00	\$12.50
4/21/2016	KO	call with class member	0.10	\$125.00	\$12.50
4/22/2016	KO	Call with class member	0.10	\$125.00	\$12.50
4/22/2016	KO	Call with class member	0.10	\$125.00	\$12.50
4/22/2016	KO	Make redwall for claim forms sent to ECLG by mistake	0.30	\$125.00	\$37.50
4/29/2016	NM	class member phone call	0.10	\$125.00	\$12.50
5/02/2016	KO	Scanned, saved, and notified OC of additional claim forms recieved	0.30	\$125.00	\$37.50
5/02/2016	KO	listened to class member voicemail, called back, left voicemail	0.10	\$125.00	\$12.50
5/02/2016	KO	listened to voicemail, called back class member	0.10	\$125.00	\$12.50
5/02/2016	KO	voicemail, returned call, spoke with class member's wife	0.10	\$125.00	\$12.50
5/02/2016	KO	Call with class member	0.20	\$125.00	\$25.00
5/02/2016	KO	left voicemail for class member	0.10	\$125.00	\$12.50
5/02/2016	KO	Call with class member	0.10	\$125.00	\$12.50
5/02/2016	KO	scanned and saved claim forms to TM, sent notification to OC	0.30	\$125.00	\$37.50
5/06/2016	KO	Class member phone call	0.10	\$125.00	\$12.50
5/06/2016	KO	Scanned, saved, notified OC of claim form recieved	0.20	\$125.00	\$25.00
5/09/2016	KO	Class member call	0.10	\$125.00	\$12.50
5/13/2016	KO	Class member call	0.10	\$125.00	\$12.50
5/18/2016	KO	Call with Class member	0.20	\$125.00	\$25.00
5/18/2016	KO	Listened to class member voicemail returned call, left voicemail	0.10	\$125.00	\$12.50

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5/18/2016	KO	Call with class member	0.10	\$125.00	\$12.50
5/19/2016	KO	Email to OC re claim form recieved	0.10	\$125.00	\$12.50
5/20/2016	KO	Call with class member	0.20	\$125.00	\$25.00
5/23/2016	KO	Scanned and saved claim form, forwarded to OC	0.20	\$125.00	\$25.00
5/24/2016	KO	Call with class member, email to TNH re same	0.30	\$125.00	\$37.50
5/24/2016	KO	Call with class member	0.10	\$125.00	\$12.50
5/24/2016	TNH	read email from KO re class member	0.10	\$325.00	\$32.50
5/25/2016	KO	Emails to and from OC re class member with missing claim form	0.20	\$125.00	\$25.00
5/26/2016	KO	Phone call with class member	0.10	\$125.00	\$12.50
5/26/2016	KO	Call with William Murphy re claim form recieved	0.10	\$125.00	\$12.50
5/27/2016	KO	Emails to TNH and OC re class member who lost their claim form	0.20	\$125.00	\$25.00
5/27/2016	KO	Updated settlement info in TM	0.10	\$125.00	\$12.50
5/27/2016	TNH	emails to KO and OC re class member	0.20	\$325.00	\$65.00
6/08/2016	TNH	review billing re redactions	2.00	\$325.00	\$650.00

Total Fees \$257,442.50

Expenses

Start Date	Description	Charges
8/09/2012	Copy	\$1.00
8/09/2012	Copy	\$1.00
8/14/2012	Copy	\$0.50
8/16/2012	Filing Fee - DAE visa	\$350.00
8/17/2012	Process server fee - chk 23006	\$50.00

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8/17/2012	Copy	\$0.25
8/17/2012	Copy	\$0.25
8/21/2012	Copy	\$0.25
9/11/2012	Copy	\$0.50
9/11/2012	Copy	\$0.50
9/30/2012	Legal research cost - Pacer - Chk23215	\$1.70
10/01/2012	Postage	\$2.10
10/02/2012	Postage	\$0.45
10/02/2012	Postage	\$4.90
10/03/2012	Postage	\$2.10
10/03/2012	Copy	\$0.50
10/09/2012	Phone charge	\$0.02
10/09/2012	Postage	\$0.45
10/10/2012	Copy	\$0.25
10/16/2012	Phone charge	\$0.05
10/31/2012	Legal research cost - Lex Nex	\$0.36
11/08/2012	Copy	\$0.75
11/29/2012	Copy	\$0.25
12/13/2012	Copy	\$1.00
12/31/2012	Legal research cost - Pacer	\$5.30
1/03/2013	Copy	\$0.25
1/03/2013	Postage	\$0.45
1/18/2013	Copy	\$1.25

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1/18/2013	Copy	\$1.25
3/12/2013	Copy	\$4.50
3/12/2013	Fax	\$19.00
3/12/2013	Copy	\$0.50
3/18/2013	Copy	\$3.50
3/18/2013	Fax	\$7.00
3/18/2013	Phone charge	\$0.13
3/31/2013	Legal research cost - Pacer	\$12.40
4/26/2013	Postage	\$1.52
6/17/2013	Postage	\$1.52
6/17/2013	Copy	\$4.00
6/30/2013	Legal research cost - Pacer	\$3.30
8/18/2013	Phone charge	\$0.60
8/21/2013	Copy	\$0.50
8/22/2013	Copy	\$0.25
10/03/2013	Copy	\$0.50
10/10/2013	Postage	\$3.44
10/10/2013	Copy	\$0.50
10/28/2013	Legal research cost	\$0.60
1/21/2014	Copy	\$43.50
1/21/2014	Copy	\$40.25
1/23/2014	Copy	\$2.00
1/30/2014	Copy	\$0.25

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1/30/2014	Postage	\$0.48
2/06/2014	Copy	\$0.25
2/10/2014	Copy	\$0.25
2/18/2014	Phone charge	\$0.04
2/21/2014	Copy	\$1.75
2/26/2014	Copy	\$1.25
2/27/2014	Postage	\$5.25
3/03/2014	Copy	\$1.75
3/04/2014	Copy	\$2.50
3/10/2014	Copy	\$1.00
3/10/2014	Postage	\$0.48
3/14/2014	Postage	\$0.48
3/17/2014	Copy	\$1.50
3/17/2014	Copy	\$1.50
3/17/2014	Copy	\$0.75
3/17/2014	Postage	\$0.69
3/19/2014	Court Reporter - transcript - chk27054	\$800.60
3/20/2014	Court Reporter - transcript - chk 25001	\$387.70
3/20/2014	Court Reporter - transcript - chk 25001	\$509.40
3/20/2014	Copy	\$2.00
3/20/2014	Copy	\$0.50
3/20/2014	Postage	\$0.48
3/21/2014	Copy	\$1.00
3/21/2014	Postage	\$0.48

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3/28/2014	Copy	\$1.75
3/28/2014	Copy	\$21.25
4/01/2014	Postage	\$0.48
4/01/2014	Copy	\$0.50
4/01/2014	Copy	\$1.00
4/03/2014	Court Reporter - transcript - chk 24994	\$65.70
4/03/2014	Litigation Support - chk24976	\$2,400.00
4/03/2014	Postage	\$0.48
4/03/2014	Postage	\$0.48
4/07/2014	Copy	\$0.25
4/07/2014	Postage	\$2.66
4/14/2014	Copy	\$8.25
4/15/2014	Expert Fee - Litigation support - chk25043	\$4,600.00
4/18/2014	Phone charge	\$0.07
4/25/2014	Copy	\$14.75
4/29/2014	Postage	\$0.48
4/29/2014	Copy	\$0.25
4/29/2014	Copy	\$1.50
4/29/2014	Copy	\$0.75
4/29/2014	Legal research cost - FOIA - chk 25067	\$41.75
5/02/2014	Court Reporter - chk25078	\$307.75
5/05/2014	Court Reporter - Transcripts of Depo - chk 25123	\$350.05
5/07/2014	Postage	\$1.61

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5/07/2014	Copy	\$4.25
5/13/2014	Copy	\$0.25
5/13/2014	Postage	\$5.49
5/16/2014	Expert Fee - Manning Silverman doing Litigation - chk 25126	\$4,960.00
5/29/2014	Copy	\$0.50
6/06/2014	Copy	\$0.75
6/18/2014	Phone charge	\$0.61
6/27/2014	Copy	\$0.25
6/30/2014	Legal research cost - Pacer	\$0.20
7/16/2014	Copy charges - Copy of Trans in E-Tran format, Exhibits scanned - chk25413	\$648.60
7/30/2014	Court Reporter - exhibits scanned - chk25821	\$687.52
8/18/2014	Phone charge	\$0.26
8/18/2014	Litigation - chk25446	\$4,440.00
8/22/2014	Copy	\$94.50
8/22/2014	Copy	\$91.50
8/27/2014	Copy	\$126.50
9/11/2014	Copy	\$0.75
9/18/2014	Phone charge	\$0.37
9/19/2014	Copy	\$0.25
9/29/2014	Copy	\$10.00
9/30/2014	Legal research cost - Pacer - chk25677	\$2.60
11/06/2014	Postage	\$0.48
12/17/2014	Court Reporter - exhibits scanned	\$648.60

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12/29/2014	Copy	\$0.75
12/29/2014	Copy	\$0.25
12/30/2014	Expert Fee	\$1,384.08
1/06/2015	Copy	\$0.50
2/03/2015	Copy	\$1.00
6/30/2015	Legal research cost- Pacer	\$0.00
10/28/2015	Copy	\$0.50
11/04/2015	Mediation chk 26681	\$0.00
11/30/2015	Mediation chk 26757	\$0.00
1/25/2016	Legal research cost- PACER chk 26903	\$8.60
5/04/2016	Phone charge	\$0.05

Total Expenses \$23,241.19

Total New Charges

\$280,683.69

Staff Summary

Name	Position	Hours	Rate	Fees
Andrea Diaz	Paralegal	1.00	\$125.00	\$125.00
Christopher Coppel	Paralegal	0.40	\$100.00	\$40.00
Christopher Coppel	Paralegal	0.50	\$105.00	\$52.50
Caitlin Mckeown	Paralegal	1.00	\$125.00	\$125.00
Cathleen M. Combs	Partner	24.00	\$700.00	\$16,800.00
Cathleen M. Combs	Partner	123.20	\$600.00	\$73,920.00
Cathleen M. Combs	Partner	4.90	\$550.00	\$2,695.00
Daniel A. Edelman	Partner	12.80	\$550.00	\$7,040.00
Daniel A. Edelman	Partner	91.10	\$600.00	\$54,660.00
Daniel A. Edelman	Partner	8.60	\$700.00	\$6,020.00
Diana Rosales	Paralegal	0.80	\$125.00	\$100.00
Francis R. Greene	Partner	0.80	\$480.00	\$384.00
Francis R. Greene	Partner	0.80	\$500.00	\$400.00
Francis R. Greene	Partner	1.50	\$445.00	\$667.50
Francis R. Greene	Partner	0.10	\$350.00	\$35.00
Jose Medina	Paralegal	1.00	\$125.00	\$125.00
James O. Latturmer	Partner	1.10	\$550.00	\$605.00

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James O. Lattuner	Partner	9.10	\$600.00	\$5,460.00
James O. Lattuner	Partner	0.80	\$700.00	\$560.00
Julie Pendleton	Paralegal	1.20	\$125.00	\$150.00
Shelby Kost	Paralegal	25.40	\$125.00	\$3,175.00
Michelle R. Teggelaar	Partner	0.10	\$500.00	\$50.00
Michelle R. Teggelaar	Partner	0.70	\$400.00	\$280.00
Michelle R. Teggelaar	Partner	1.80	\$445.00	\$801.00
Megan Stewart	Paralegal	0.40	\$100.00	\$40.00
Nora Meyers		0.30	\$125.00	\$37.50
Noah Steimel	Paralegal	41.80	\$125.00	\$5,225.00
Stephen Reineccius		0.30	\$125.00	\$37.50
Sandra Cordoba	Paralegal	0.50	\$125.00	\$62.50
Sarah Crocker	Paralegal	14.00	\$105.00	\$1,470.00
Sarah Crocker	Paralegal	11.70	\$100.00	\$1,170.00
Sarah Crocker	Paralegal	58.30	\$125.00	\$7,287.50
Sarah Smolyansky	Paralegal	0.90	\$125.00	\$112.50
Thomas E. Soule	Partner	0.30	\$395.00	\$118.50
Tara L. Goodwin	Partner	1.00	\$550.00	\$550.00
Tiffany N. Hardy	Partner	25.70	\$290.00	\$7,453.00
Tiffany N. Hardy	Partner	179.50	\$325.00	\$58,337.50
Tiffany N. Hardy	Partner	5.20	\$230.00	\$1,196.00
Terrance Scotton	Paralegal	0.60	\$125.00	\$75.00
		Tot Hrs: 653.20		

EXHIBIT 2

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS

Claribel Perez, n/k/a Andino,
individually and on behalf of all others
similarly situated,

Plaintiff,

V.

Monarch Recovery Management, Inc., a
Pennsylvania corporation,

Defendant.

No. 13 C 5694

Judge Zagel

**ORDER GRANTING FINAL APPROVAL
OF CLASS ACTION SETTLEMENT**

This cause comes before the Court for final approval of the Class Action Settlement Agreement and for Dismissal of this action pursuant to the terms of the Class Action Settlement Agreement, due notice having been given, and the court being duly advised in the premises:

THE COURT HEREBY FINDS THAT:

1. The parties entered into a Class Action Settlement Agreement ("Settlement Agreement"), dated November 21, 2014.
2. On December 4, 2014, that Settlement Agreement was, pursuant to F.R.C.P. 23, preliminarily approved by this Court and a Class was certified in this matter based upon the parties' stipulations and solely for the purpose of settlement.
3. Pursuant to this Court's Order and ¶ 9 of the Settlement Agreement, the Notice of Class Action was mailed by Plaintiff's Counsel to each of the 88 members of the Class. Two notices were returned by the United States Postal Service with forwarding addresses and re-mailed, twenty-two were returned by the United States

Postal Service as undeliverable with no further information. Skip traces were performed on returned notices, which resulted in ten notices being re-mailed; seven of these re-mails, however, were returned as undeliverable with no forwarding information. The dissemination of Notice, as provided in the Preliminary Approval Order and the Settlement Agreement, constituted the best practicable notice under the circumstances to all Class Members and fully met the requirements of Fed.R.Civ.P. 23, any and all substantive and procedural due process rights guaranteed by the United States Constitution and any other applicable law.

4. No objections were received, no members of the Class sought leave of this Court to intervene, and no members opted-out of this action, while fourteen members of the Class returned claim forms.

5. The Complaint in this action alleged that Defendant violated the Fair Debt Collection Practices Act, 15 U.S.C. § 1692 et seq. ("FDCPA").

6. Defendant denies that it has violated the FDCPA in any way.

7. The Complaint sought recovery of statutory damages pursuant to § 1692k of the FDCPA. Under § 1692k, the maximum statutory damages recoverable by an individual plaintiff is up to \$1,000 and the maximum statutory damages recoverable by a class is the lesser of 1% of the Defendant's net worth or \$500,000. Here, the maximum statutory damages recoverable are \$23,000.

8. The Settlement Agreement calls for the Defendant to pay \$1,000 to the Class Representative, Claribel Perez, n/k/a Andino, and to pay \$23,000 to the Class, which will be distributed \$1,000 to each of the fourteen class members who returned a claim form, with the remainder being paid to the Chicago Legal Clinic as a cy pres

remedy, and the retirement of every Class Members' underlying Citibank/Asset Acceptance account.

9. The Court finds that the settlement negotiations were conducted at arms-length and in good faith among all counsel and that the terms of the Settlement Agreement are fair, reasonable and adequate to Plaintiff and all members of the Class. In addition to the other facts stated herein, the Court finds the Settlement Agreement to be particularly fair, adequate and reasonable in light of the risk of establishing liability and the expense of further litigation.

10. The \$23,000 Class settlement fund shall be distributed, within 21 days of the final approval of the settlement, by Class Counsel, as set forth above, by U.S. Mail to each member of the Class who returned a claim form. Any portion of the \$23,000, which is unclaimed by the Settlement Class, because money was left over after claims were paid, or because the Settlement check is returned as undeliverable or without a forwarding address, or because the check remains uncashed 60 days after distribution, shall be distributed to the Chicago Legal Clinic ("CLC") as a cy pres remedy; 120 days after final approval, Class Counsel shall provide the Court and Defendant's Counsel with a report regarding the number of checks that were returned or were not cashed and the amount distributed to the cy pres recipient.

11. Pursuant to ¶¶ 7 & 8 of the Settlement Agreement, the Defendant has agreed to pay \$99,500 for Class Counsel's attorneys' fees and costs incurred in this matter, which amount will be paid out in five (5) monthly installments of \$10,000, to be made by May 18, 2015, June 17, 2015, July 17, 2015, August 17, 2015, and September 16, 2015, with a final payment of \$49,500 to be made by October 16, 2015. Class

Counsel has submitted a motion detailing their hourly rates (\$550 for David J. Philipps, \$540 for Mary E. Philipps, \$250 for associate, Angie K. Robertson, and \$185 for paralegals), the hours worked and costs incurred in this matter. This Court finds the rates and hours reasonable and, accordingly, grants Class Counsel's motion, and approves the \$99,500 amount that Defendant have agreed to pay to Class Counsel for their fees and costs.

12. Pursuant to ¶ 7 of the Settlement Agreement, the \$1,000 due to the Class Representative and the \$23,000 due to the Class, shall be paid by Defendant to the Philipps & Philipps, Ltd., Fiduciary Account within 21 days of the date of this order, which is to be held in trust until the appeal period has run. Moreover, the installment payments for the \$99,500 due to Class Counsel for their attorneys' fees and costs shall be paid by Defendant to Class Counsel as set forth above.

IT IS HEREBY ORDERED THAT:

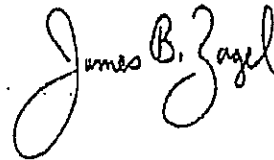
1. The Settlement Agreement, dated November 21, 2014, is hereby approved.
2. Plaintiff and the Class shall be forever barred and enjoined from instituting or further prosecuting, in any forum whatsoever, including but not limited to, any State, Federal, or Foreign Court, against Defendant Monarch and its client, Asset Acceptance, LLC, Encore Capital Group, Inc., Midland Funding, LLC, and Midland Credit Management, Inc., their past or present parents, affiliates, subsidiaries, successors, predecessors, and assigns, and their present or former directors, officers, employees, partners, members, principals, employees, agents, insurers and attorneys, including

any and all claims that were asserted or alleged or which could have been asserted or alleged in this lawsuit; (iv) provides that Defendant shall be barred identically from pursuing any claim for relief under 15 U.S.C. § 1692k (a)(3), 28 U.S.C. § 1927, or F.R.C.P. Rule 11, against Plaintiff, her Counsel, or any member of the Class arising out of the claims asserted or alleged, or which could have been asserted or alleged, against Defendant in this action.

3. Defendant shall pay \$24,000 (\$1,000 due to the Class Representative, \$23,000 to the Class) to the Philipps & Philipps, Ltd., Fiduciary Account within 21 days of the final approval of the this settlement; 120 days after the final approval of the settlement, Class Counsel shall provide the Court and Defendant's Counsel with a report regarding the number of checks that were returned or remain uncashed, and shall distribute any remaining funds to the Chicago Legal Clinic as a cy pres remedy.
4. The \$99,500 due for Class Counsel for their attorneys' fees and costs shall be paid in five (5) monthly installments of \$10,000, to be made by May 18, 2015, June 17, 2015, July 17, 2015, August 17, 2015, and September 16, 2015, with a final payment of \$49,500 to be made by October 16, 2015.
5. This Court reserves jurisdiction over all matters arising out of the Settlement Agreement.
6. This action is hereby dismissed without prejudice and without costs; upon filing of the final report as to the distribution of the settlement fund to the

Class and report that the attorneys' fees and costs have been paid, this dismissal shall be converted into a dismissal with prejudice and this Court will no longer retain jurisdiction of this matter.

7. This order resolves all claims against all parties in this action.



Judge James B. Zagel,
United States District Court

DATED: March 19, 2015

Subj: Activity in Case 1:13-cv-05694 Perez v. Monarch Recovery Management, Inc. et al order
Date: 4/6/2015 3:00:37 P.M. Central Daylight Time
From: usdc_ecf_ilnd@ilnd.uscourts.gov
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United States District Court

Northern District of Illinois - CM/ECF-LIVE, Ver 6.1

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Case Name: Perez v. Monarch Recovery Management, Inc..et al

Case Number: 1:13-cv-05694

Filer:

Document Number: 91

Docket Text:

ORDER Granting Final Approval of Class Action Settlement. Signed by the Honorable James B. Zagel on 3/19/2015.Mailed notice(ep,)

1:13-cv-05694 Notice has been electronically mailed to:

Amy R Jonker ajonker@dykema.com, doctel@dykema.com, FSDocketing@dykema.com, kschuiling@dykema.com, tgreer@dykema.com

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David J. Philipps davephilipps@aol.com, efalz1@aol.com

Margaret J. Rhiew mrhiew@dykema.com, FSDocketing@dykema.com

Mary Elizabeth Philipps mephilipps@aol.com

Paul Gamboa pgamboa@gordonrees.com, kcastleberry@gordonrees.com

Robert M. Horwitz rhorwitz@dykema.com

1:13-cv-05694 Notice has been delivered by other means to:

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Document description:Main Document

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[STAMP dcecfStamp_ID=1040059490 [Date=4/6/2015] [FileNumber=14311061-0] [3b4b3f5af66cee2785538f28ca274aebb1d14dff93201f8ebe0d1b6e18fff1df60f5336476fe3ffb0abea79c500d4f3c0a19d46d89c824c537d0e12d46134cd7]]

Monday, April 06, 2015 AOL: DavePhilipps

EXHIBIT 3

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**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

DAVID MOORE,)	
on behalf of himself and a class,)	
)	
Plaintiff,)	
)	Case No. 13-CV-02294
)	
v.)	Judge Virginia M. Kendall
)	
STELLAR RECOVERY, INC. and)	Magistrate Judge Sidney I. Schenkier
DOES 1-10,)	
)	
Defendants.)	

FINAL APPROVAL ORDER

Upon consideration of the parties' request for final approval of the Class Settlement Agreement ("Agreement") between Plaintiff, David Moore ("Plaintiff"), individually, and as representative of the class of persons defined below ("Class"), and Defendant, Stellar Recovery, Inc., the Court orders and finds as follows:

1. On January 13, 2015, the Court preliminarily approved the Agreement on behalf of Plaintiff and a Class consisting of:

(a) all natural persons with Illinois, Indiana, or Wisconsin addresses; (b) to whom Defendant sent a Letter in the form represented by Exhibit C to Plaintiff's Complaint; (c) that names Stellar Recovery, Inc. as the current creditor; (d) on or after March 27, 2012 (one year prior to the filing of this action) and on or before April 16, 2013 (20 days after the filing of this action).

2. The Court approved a form of notice for mailing to the class. The Court is informed that actual notice was sent by first class mail to approximately 14,617 class members by Defendant. A total of 16 envelopes were returned by the United States Postal Service as undeliverable. Two class members requested exclusion, and no objections were filed or

received. A total of 675 claim forms were returned, including 62 late claim forms received as of May 21, 2015. The Court will allow the 62 late claim forms.

3. On May 21, 2015 the Court held a fairness hearing to which class members, including any with objections, were invited. No class members objected or requested exclusion from the settlement at the hearing.

4. The following individuals are excluded from the settlement class:

- a. Donna Schildbach
- b. Benita Buck

5. The Court finds that provisions for notice to the class satisfy the requirements of Federal Rule of Civil Procedure 23 and due process.

6. The Court finds that the settlement is fair, reasonable, and adequate and hereby finally approves the Agreement submitted by the parties, including the Release and payments by Defendant.

7. Upon the Effective Date, as that term is defined in the Agreement, Defendants shall make the following payments:

- a. Relief to Plaintiff. Defendants will pay \$4,500.00 to Plaintiff as damages, for his individual (non-Class) claims, for his Class claims, and as an incentive award for bringing the claims on behalf of the Class.
- b. Class Recovery. Defendants will create a class settlement fund of \$20,000.00 ("Class Fund"), which a settlement administrator will distribute *pro rata* among Class Members who timely and properly submit a claim form that is completely filled out, executed under penalty by a person who is a Class Member (or is his, her or its legal representative), has not opted-out of the Settlement, and is not rejected as an invalid claim ("Valid Claim"). Claimants will receive a *pro rata* share of the Class Fund by check. Checks issued to Claimants will be void after 90 days. If any portion of the Class Fund remains 30 days after the void date on the Claimants' checks, these remaining funds will be distributed as set forth in Paragraph 14 of the Class Settlement Agreement.
- c. Attorney Fees and Costs. Defendant will pay Class Counsel \$62,500, which amount was approved by the Court on February 19, 2015.

8. Upon the Effective Date of the Agreement, the Parties grant the following releases:

a. Plaintiff, David Moore, including each and every one of his respective agents, representatives, attorneys, heirs, assigns, or any other person acting on his behalf or for his benefit, and any person claiming through him (collectively "Releasers"), release and discharge Defendant Stellar Recovery, Inc., as well as its parent, subsidiary and sister corporations, predecessors and successors in interest and present and former affiliates, subsidiaries, insurers, officers, directors, agents, employees, members, shareholders, general partners, limited partners, beneficiaries, representatives, heirs, attorneys, assigns, (in their capacities as such) or entities for which said Defendant performs collection services (collectively, "Released Parties"), from any and all actual or potential claims, actions, causes of action, suits, counterclaims, cross claims, third party claims, contentions, allegations, and assertions of wrongdoing, and any demands for any and all debts, obligations, liabilities, damages (whether actual, compensatory, treble, punitive, exemplary, statutory, or otherwise), attorneys' fees, costs, expenses, restitution, disgorgement, injunctive relief, any other type of equitable, legal or statutory relief, any other benefits, or any penalties of any type whatever, whether known or unknown, suspected or unsuspected, contingent or non-contingent, or discovered or undiscovered, whether asserted in federal court, state court, arbitration or otherwise, and whether triable before a judge or jury or otherwise, including, without limitation, those based on violation of the FDCPA, FDCPA State Equivalents, or any other state, federal, or local law, statute, regulation or common law, that were alleged or could have been alleged in the Litigation. Plaintiff does not release the right to dispute the debt Defendant attempted to collect and does not waive any defenses to the alleged debt.

b. Each member of the Class who does not opt out of the Class releases and discharges the Released Parties from any and all actual or potential claims, actions, causes of action, suits, counterclaims, cross claims, third party claims, contentions, allegations, and assertions of wrongdoing, and any demands for any and all debts, obligations, liabilities, damages (whether actual, compensatory, treble, punitive, exemplary, statutory, or otherwise), attorneys' fees, costs, expenses, restitution, disgorgement, injunctive relief, any other type of equitable, legal or statutory relief, any other benefits, or any penalties of any type whatever, whether known or unknown, suspected or unsuspected, contingent or non-contingent, or discovered or undiscovered based on the form letter attached to the Complaint as Exhibit A and specifically related to the inconsistent statements regarding the identification of the current creditor. The Class expressly does not release any right to dispute the debts or any defenses to the debts or claims unrelated to letter attached to the Complaint as Exhibit A. Nothing contained herein shall preclude Defendant from attempting to collect any outstanding balances that Class Members owe to the Released Parties.

9. The Court finds the Agreement fair and made in good faith.

10. The terms of the Agreement are incorporated into this order.

11. Within thirty (30) days after Defendant (1) makes all payments, including distributions to class members, payments of class notice and administration, issues all *cy pres* awards as set forth in ¶14, and all attorneys fees and costs to Class Counsel as ordered by the Court, and (2) files all Final Accountings of the Settlement setting forth its compliance with this Agreement, Plaintiff shall present an Order to the court dismissing the claims of the Plaintiff and the Class members against Defendant with prejudice.

ENTERED: _____


Virginia M. Kendall
United States District Judge

DATED: _____

5-22-15